

**FINAL**

# MANAGEMENT FRAMEWORK PLAN AMENDMENT/ ENVIRONMENTAL IMPACT STATEMENT



ROSSELL  
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DEPARTMENT OF INTERIOR  
BUREAU OF LAND MANAGEMENT  
ROSSELL DISTRICT OFFICE  
SEPTEMBER 1984







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MANAGEMENT FRAMEWORK PLAN AMENDMENT

ENVIRONMENTAL IMPACT STATEMENT

ON

RANGELAND MANAGEMENT IN THE

ROSWELL RESOURCE AREA

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Abstract: The Bureau of Land Management, Roswell District Office, proposes to implement a rangeland management program for the Roswell Resource Area located in Chaves, Lincoln, Quay, Curry, DeBaca, Guadalupe, and Roosevelt counties of southeastern New Mexico. The Rangeland Management issue involves the amount of vegetation available for grazing and other uses; the methods of monitoring and evaluation, and rangeland improvements. A Proposed Plan has been prepared following analysis of six previously formulated alternatives. The Plan was developed following a 90-day review of the Draft MFPA/EIS, which describes and analyzes the six alternatives. A general implementation schedule is outlined and included as part of the Proposed Plan.

Type of Action      (x) Administrative      ( ) Legislative

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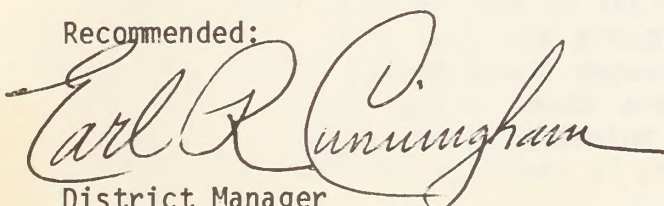
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Comments have been requested from: See Chapter 4.

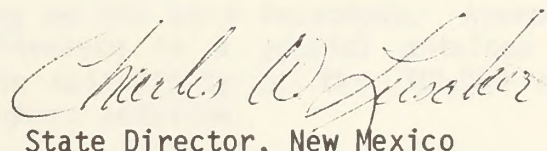
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Recommended:

Approved:



District Manager  
Roswell District Office  
Roswell, New Mexico



State Director, New Mexico



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## SUMMARY

### INTRODUCTION

The Roswell District of the Bureau of Land Management is developing a rangeland management program for the Roswell Resource Area (RRA). The objectives of this program are, (1) to prescribe actions necessary to protect and improve the natural and environmental qualities of the area, (2) to provide food and habitat for wildlife and domestic animals, and (3) to provide for outdoor recreation and human occupancy and use.

The RRA contains approximately 1.5 million acres of public land in Chaves, Roosevelt, Lincoln, Curry, Quay, Guadalupe, and DeBaca counties in southeastern New Mexico. Of this amount, approximately 500,000 acres are in Chaves County east of the Pecos River. A Grazing Environmental Impact Statement and rangeland management program were completed and approved for this area in September 1979. The program was implemented in late 1979 and early 1980. This document will not include any additional proposed actions for the east Chaves area except for the chemical control of shinny oak (Quercus havardii).

In the area excluding east Chaves County, there are 284 grazing allotments permitted or leased to 221 livestock operators. The public lands on these allotments support approximately 13,000 cattle and 36,000 sheep. The area contains approximately 8,000 miles of livestock fencing and 3,000 water developments. It is considered one of the more highly developed areas in the state. Many of these improvements have been constructed by livestock operators over the last 40 years.

Rangeland studies were established on this area in 1982. Initial range conditions determined from these studies place 25,000 acres (3 percent) in excellent condition, 510,000 acres (51 percent) in good condition, 340,000 acres (34 percent) in fair condition and 23,000 acres (2 percent) in poor ecological condition. The studies also included a determination of apparent trend. According to these studies, 845,000 acres are in an improving trend, 49,000 acres are in a static trend and 4,000 acres in a downward trend. Range condition and trend studies were not conducted on 93,000 acres of scattered isolated parcels of public land in the area.

Watershed studies place 60,000 acres (6 percent) in stable condition, 790,000 (79 percent) in a slight erosion class, 130,000 (13 percent) in a moderate class and 20,000 acres (2 percent) in a critical erosion class.

The area supports a variety of wildlife species, including approximately 25,000 mule deer and 4,800 pronghorn antelope. Ninety-five percent of the public land habitat for these species is in fair to good condition and is in a static trend. Five percent of the habitat is in poor condition and also in a static trend. Mule deer and pronghorn antelope numbers are either static or experiencing an upward trend depending on the herd locations. Approximately 700,000 acres of public lands are involved in a special antelope habitat study. This study will determine the suitability of the 700,000 acres to support introduced populations of pronghorn antelope.



Upland game birds are found throughout the area with the exception of the lesser prairie chickens, which are only found east of the Pecos River.

In 1983, the 284 grazing allotments were placed in management categories based on 3 criteria: resource conflicts, range condition and trend, and potential for improvement. As a result of this study, 84 allotments (609,252 acres) were placed in an "M" or "Maintain" category, 38 allotments (290,493 acres) were placed in an "I" or "Improve" category and 162 allotments (93,666 acres) were placed in a "C" or "Custodial" category. The purpose of categorization is to help establish priorities for utilization of available funds and personnel in a manner which will achieve cost-effective improvement of rangeland condition, trend and production and to resolve conflicts with other resources. The "I" category allotments have the highest priority and potential for improvement.

#### **DESCRIPTION OF ALTERNATIVES AND IMPACTS**

Six rangeland management program alternatives have been developed for evaluation to determine which alternative or combination of alternatives will best achieve the 3 objectives mentioned on page i.

The alternatives, with a brief description, are discussed below.

#### **PROPOSED ACTION (PA)**

The Proposed Action is the continuation of current management practices. It basically means things would be done and continue to happen, as they are at the present time. It includes the following components:

Authorized numbers of livestock would not change;

No new cooperative management plans (CMPs) would be developed;

BLM range improvement projects and vegetation treatments would be limited to the East Chaves area, Ft. Stanton Research Area, and allotments with existing Allotment Management Plans (AMPs).

The environmental consequences which would result with implementation of this alternative include the following:

Wildlife (big game, upland game and waterfowl) numbers would fluctuate slightly with climate and habitat conditions but would generally remain the same;

Range and watershed conditions would remain about the same and continue their current trends;

Recreation visitor hours would not change under this alternative;

No change in socioeconomic conditions would occur.



## **DISTRICT PREFERRED ALTERNATIVE (DPA)**

The management direction in this program is to enhance multiple resource values and correct identified problems through specific management actions. The DPA includes the following components:

Livestock adjustments would be made on "M" and "I" category allotments as indicated by existing rangeland monitoring studies.

CMPs would be prepared on the 38 allotments in the "I" category;

BLM range improvements and vegetation treatments would be implemented on the "I" category allotments.

The environmental consequences which would result with implementation of this alternative include the following:

Livestock numbers would decrease 4 percent in the short term and increase 7 percent in the long term;

Wildlife numbers would increase or remain unchanged.

Mule deer +17%

Antelope +27%

Upland game and waterfowl - unchanged

Range conditions would improve; acreage in the good condition class would increase by 34 percent;

Watershed conditions would improve with the acreage in the critical erosion class decreasing by 35 percent;

Recreation visitor hours would increase by 18 percent (10,151 hours);

Socioeconomic conditions would reflect a 3.9 percent increase in ranch operators' overall gross income.

## **INDUSTRY PREFERRED ALTERNATIVE (IPA)**

This alternative was developed and offered by the New Mexico Department of Agriculture and the Southeastern New Mexico Grazing Association. In this alternative, emphasis is placed on range improvements and vegetation treatments with minimal BLM management. It includes the following:

Livestock adjustments would be made on "M" and "I" category allotments as indicated by existing rangeland monitoring studies.

No new CMPs would be developed on any allotments;

BLM range improvements and vegetation treatments would be implemented on the "I" category allotments through development plans.



The environmental consequences which would result with implementation of this alternative include the following:

Livestock numbers would decrease 4 percent in the short term and increase 3 percent in the long term;

Wildlife numbers would increase or remain unchanged;

Mule deer +11%

Antelope +9%

Upland game and waterfowl - unchanged;

Range conditions would improve, with acreage in the good condition class increasing by 8 percent;

Watershed conditions would improve, with the acreage in the critical erosion class decreasing by 20 percent;

Recreation visitor hours would increase by 13 percent (7,403 hours);

Socioeconomic conditions would reflect a 3.5 percent increase in ranch operators' overall gross income.

### **ELIMINATION OF LIVESTOCK GRAZING (ELG)**

All domestic livestock grazing would be removed from the public lands under this alternative, which includes the following components:

All grazing preference would be suspended as permits and leases expire;

Existing AMPs would be cancelled. No new CMPs would be developed;

BLM rangeland improvement projects would be for wildlife habitat and watershed improvement by special appropriation.

The environmental consequences which would result with implementation of this alternative include the following:

Livestock numbers would decrease 78 percent in the short term and 100 percent in the long term;

Wildlife numbers would increase:

Mule deer +33%

Antelope +49%

Upland game and waterfowl - slight increase;

Range conditions would improve, with acreage in the good condition class increasing by 53 percent;

Watershed conditions would improve, with the acreage in the critical erosion class decreasing by 20 percent;

Recreation visitor hours would increase by 35 percent (19,040 hours);

Socioeconomic conditions would reflect a 47.8 percent decrease in ranch operators' overall gross income.

## **MAXIMIZATION OF FORAGE FOR LIVESTOCK (MAX)**

The management direction under this alternative is to initiate an intensive program of rangeland management to achieve maximum forage production for livestock. It includes the following:

Livestock adjustments would be made on "M" and "I" category allotments as directed by rangeland monitoring studies;

CMPs would be prepared on 122 allotments in the "M" and "I" categories;

BLM range improvements and vegetation treatments would be implemented on "M" and "I" category allotments.

The environmental consequences which would result with implementation of this alternative include the following:

Livestock numbers would decrease 5 percent in the short term and increase 28 percent in the long term;

Wildlife numbers would decrease:

Mule deer -5%

Antelope -25%

Upland game and waterfowl - slight decrease;

Range conditions would change, with a 20 percent decrease in the good condition class acreage;

Watershed conditions would improve, with the acreage in the critical erosion class decreasing by 35 percent; a/

Recreation visitor hours would decrease by 7 percent (3,633 hours);

Socioeconomic conditions would reflect a 17.7 percent increase in ranch operators' overall gross income.

## **DECREASED LIVESTOCK GRAZING (DLG)**

Management direction is to improve range and watershed conditions and wildlife habitat through livestock reductions. Included in this alternative are the following:

Grazing preference would be reduced by 50% on fair condition range and by 100% on poor condition range;

No new CMPs would be developed;



BLM range improvement projects would be limited to the East Chaves area, Ft. Stanton, and allotments with existing AMPs.

The environmental consequences which would result with implementation of this alternative include the following:

Livestock numbers would decrease 23 percent;

Wildlife numbers would increase or remain unchanged:

Mule deer +21%

Antelope +16%

Upland game and waterfowl - unchanged;

Range conditions would improve, with the acreage in the good condition class increasing by 52 percent;

Watershed conditions would improve, with the acreage in the critical erosion class decreasing by 20 percent;

Recreation visitor hours would increase by 17 percent (9,462 hours);

Socioeconomic conditions would reflect a 19.5 percent decrease in ranch operators' overall gross income.

a/ Vegetation treatments would be accomplished on the areas that are included in the critical erosion class and management would be applied to these areas.





TABLE 1

COMPARISON OF ENVIRONMENTAL CONSEQUENCES

	PA		DPA		IPA		ELG		MAX		DLG	
	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term
Vegetation												
AUMs	228,656	228,656	219,695	246,028	219,695	236,937	51,924	D	220,871	296,061	175,686	175,686
Forage Production	NC	NC	NC	7%	NC	4%	4%	2%	8%	-1%	NC	2%
Ecological Condition Class (ac) a/												
Undetermined ("C") b/	NC	93,666	NC	93,666	NC	93,666	NC	93,666	NC	93,666	NC	93,666
Excellent	NC	25,332	NC	25,332	NC	25,332	NC	25,332	Dec	20,262	NC	25,332
Good	NC	510,108	Inc	683,427	Inc	552,150	Inc	780,201	Dec	408,086	Inc	774,939
High Fair	NC	270,093	Oec	151,584	Oec	248,715	Dec	45,210	Inc	447,895	Dec	47,922
Low Fair	NC	70,710	Dec	39,402	Dec	65,558	Dec	25,500	Oec	18,798	Dec	28,050
Poor	NC	23,502	Oec	0	Oec	7,990	NC	23,502	Oec	4,704	NC	23,502
Soils/Watershed												
Surface Runoff												
Range Site:												
Loamy/Gyp Upland	NC	NC	NC	NC	NC	NC	NC	NC	Inc	10%	NC	NC
Loamy	NC	NC	Oec	-18%	Oec	-9%	Dec	-9%	Oec	-9%	Dec	-9%
Loamy/Hills	NC	NC	NC	NC	NC	NC	Dec	-37%	Inc	20%	Dec	-19%
Sandy	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC
Malpais	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC
Limestone Hills	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC
Sediment Yield	NC	.40 ac ft/ sq mi/yr	Dec	.30 ac ft/ sq mi/yr	Dec	.35 ac ft/ sq mi/yr	Dec	.35 ac ft/ sq mi/yr	Oec	.30 ac ft/ sq mi/yr	Oec	.35 ac ft/ sq mi/yr
Erosion Classes (ac)												
Stable	NC	59,605	Inc	61,605	Inc	60,605	Inc	60,605	Inc	61,605	Inc	60,605
Slight	NC	784,795	Inc	787,795	Inc	786,795	Inc	786,795	Inc	787,795	Inc	786,795
Moderate	NC	129,143	Inc	131,143	Inc	130,143	Inc	130,143	Inc	131,143	Inc	130,143
Critical	NC	19,868	Oec	12,868	Oec	15,868	Oec	15,868	Dec	12,868	Oec	15,868
Daily Livestock Consumption (Gals)	NC	228,700	219,700	246,000	219,700	236,900	51,900	0	220,900	296,100	211,000	175,700
Wildlife												
Special Habitat Features (SHFs)	NC	NC	NC	NC	NC	-	+	+	-	-	NC	NC
Desert Mule Oeer	NC	1,809	Inc	2,100	Inc	2,050	Inc	2,435	Oec	1,700	Inc	2,179
West c/ (east) d/	NC	300	Inc	518	NC	NC	NC	NC	NC	NC	NC	NC
Pronghorn Antelope	NC	385	Inc	469	Inc	415	Inc	512	Oec	240	Inc	436
West c/ (east) d/	NC	219	Inc	365	NC	NC	NC	NC	NC	NC	NC	NC
Prairie Chickens d/	NC	2,600	Inc	3,700	NC	NC	NC	NC	NC	NC	NC	NC
Mourning Dove	NC	NC	Inc	Inc	Inc	Inc	Inc	Inc	Oec	Dec	NC	NC
Scaled Quail	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC
Threatened and Endangered Plants and Animals	Any action which could adversely impact a T&E species requires site-specific mitigation to avoid a "may-affect" determination.											
Air Quality	NC	NC	Dec	Inc	Dec	Inc	Inc	Inc	Dec	Inc	Inc	Inc
Cultural Resources	NC	NC	NC	NC	NC	NC	-	+	-	-	+	+
Recreation												
Cave Resources	NC	NC	+	+	NC	+	+	+	-	-	+	+
Visitor Hours:												
West c/ (east) d/	55,156	55,156	Inc	65,307	Inc	62,559	Inc	74,196	Oec	51,523	Inc	64,618
	NC	11,006	Inc	17,335	NC	NC	NC	NC	NC	NC	NC	NC
Visual Resources	NC	NC	Oec	Inc	Oec	Inc	Inc	Inc	Oec	NC	NC	Inc
Socioeconomic Conditions												
Gross Income	\$6,031,975	\$6,031,975	\$5,921,318	\$6,269,240	\$5,921,318	\$6,244,321	\$3,730,719	\$3,148,691	\$5,929,598	\$7,104,324	\$4,855,740	\$4,855,740
Employment (no. of jobs)	NC	NC	-7	14	-7	12	-195	-230	-6	63	-70	-70
Personal Income	NC	NC	-\$45,700	\$98,000	-\$45,700	\$84,200	-\$950,000	-\$1,193,000	-\$42,000	\$442,708	-\$486,575	-\$486,575
Recreation Revenue e/												
West c/ (east) d/	NC	\$759,273	Inc	\$832,256	Inc	NC	Inc	\$895,874	Oec	\$732,039	Inc	\$827,090
	NC	\$73,207	Inc	\$116,001	NC	NC	NC	NC	NC	NC	NC	NC

Source: BLM RRA EIS Files

- a/ Short term change is in the number of acres per class  
b/ Condition class as yet undetermined due to the small amounts of public land involved or isolated and scattered tracts  
c/ Resource Area excluding Chaves County east of the Pecos River  
d/ Chaves County east of the Pecos River  
e/ Dollars/year generated by recreational activities on public land

NC: No change  
+: Beneficial  
-: Adverse  
Inc: Increasing or Improving  
Dec: Decreasing or Declining





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SUMMARY OF THE DRAFT REPORT

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Figure 1: Summary of the literature review



# PROPOSED PLAN







# **Proposed Rangeland Management Plan for the Roswell Resource Area**

## **HOW THE PROPOSED PLAN WAS SELECTED**

The Proposed Rangeland Management Plan was selected by a team composed of the District Manager, Area Manager, Team Leader, resource specialists, and was reviewed by the State Director. The plan was selected based on (1) the items of concern raised during the planning process, (2) public input received during the 90-day comment period and at public hearings and meetings, (3) the evaluation criteria described in the Draft MFPA/EIS, and (4) the environmental and socioeconomic analyses developed on the six previously formulated alternatives.

## **DESCRIPTION OF THE PROPOSED PLAN**

The proposed plan is a modified version of the preferred alternative presented in the Draft MFPA/EIS. The modification to the District Preferred Alternative (DPA) incorporates portions of the Decreased Livestock Grazing Alternative (DLG), Industry Preferred Alternative (IPA) and the Maximization of Forage for Livestock Alternative (MAX). The proposed plan is described in detail below. To help the reader understand what the modifications to the DPA are, the modifications are underlined and then followed with a DLG, IPA or MAX to show which portion of each one of the alternatives has been incorporated into the proposed plan.

Objective. The main objective of the Proposed Plan is to enhance multiple resource values through a rangeland improvement program in accordance with current BLM policy. The Proposed Plan is designed to correct existing problems using a more intensive management program than is currently in effect and to maintain good conditions where they exist.

## **PROPOSED PLAN**

### **Livestock Use Authorization**

Short term and long term stocking rates will be determined and adjustments made based on 5 years of monitoring studies after consultation with permittees and the Target Group. Decreases of livestock numbers will occur as needed in the "I" category allotments. Downward adjustments will be applied to, and in proportion to, the amounts of fair condition and poor condition acres as indicated by the monitoring studies. Reductions would be commensurate with the proportion of rangeland (per allotment) in fair or poor condition (DLG). Two year interim grazing decisions establishing interim stocking rates will be issued on "I" allotments by 12/31/85. Should the 3 years of completed monitoring studies indicate the need for immediate adjustments, they will be made through agreement or by decision. Further agreements or decisions on "I" allotments will be issued in the fall of 1987 based on 5-year monitoring studies. Adjustments will be implemented 3/1/88 and will start the 5-year adjustment schedule.

Any increases of livestock numbers will occur in "M" category allotments as indicated by 5 years of monitoring studies. Two year interim decisions will be issued by 6/30/85 on "M" allotments with no proposed change in



livestock use. Further decisions will be issued in the fall of 1987 based on 5-year monitoring studies.

No grazing decisions will be issued on "C" allotments as grazing use will remain unchanged. Livestock use authorization will be documented in the grazing case file and in the Rangeland Program Summary.

#### Rangeland Improvements

First priority to authorizing the construction, modification and maintenance of range improvements will be given to improvements fully funded by permittees or lessees. Second priority will be given to BLM investment in improvements identified for the "I" category allotments (IPA). Improvements currently identified in the "I" category allotments include:

- 15.5 miles of 4 strand barbed-wire fencing
- 17.5 miles of net-wire fencing (non-antelope areas)
- 32.5 miles of water pipeline
- 38 new water developments

Third priority will be given to BLM investment in improvements identified for the "M" category allotments (MAX). These improvements include:

- 2 miles of 4 strand barbed-wire fence
- 12 miles of net-wire fencing (non-antelope areas)
- 36.6 miles of water pipeline
- 42 new waters
- 1 livestock enclosure a/

#### Vegetation Treatments

First priority for vegetation treatments west of the Pecos River will be on "I" category allotments. Amounts currently identified are as follows:

Target Vegetation and Type of Control	Acres
Mesquite	
-Mechanical	1,785
-Chemical	20,065
Cholla	
-Mechanical	14,410
Creosote	
-Chemical	1,970
Snakeweed	
-Chemical	13,142 <u>b/</u>
Sacaton	
-Prescribed Burn	650
Total	52,022 <u>b/</u>

a/ Approximately 22 acres directly above Torgac Cave will be excluded from livestock grazing as discussed on page 3-25 of the DEIS. The analysis presented for the DPA in Chapter 3 of the DEIS indicated that the enclosure will ensure protection of the cave resource as well as prevent livestock from being trapped in the sinkholes.

b/ An additional 5,000 acres of snakeweed control were identified subsequent to the preparation of the DEIS.



Second priority for brush control projects west of the Pecos River will be on "M" category allotments as shown below (MAX).

Target Vegetation and Type of Control	Acres
Mesquite	
-Chemical	1,480
Cholla	
-Mechanical	1,460
Creosote	
-Chemical	80
Sacaton	
-Prescribed Burn	1,230
Total	4,250

Shinnery oak control by chemical treatments will continue over a 15-year period on approximately 150,000 acres in Chaves County east of the Pecos River.

#### Grazing Programs

Documented grazing programs and/or development plans (CMPs) will be implemented on "I" category allotments. Grazing programs will include deferred, rotation, high-intensity-short duration systems, and other specific grazing systems which combine proper grazing use with scheduled rest periods. Second priority for CMP development, if required for resource protection or to incorporate range improvement and vegetation treatments will be given to "M" category allotments (MAX).

#### Wildlife

Additional forage will be provided for big game and other wildlife species from vegetation treatments. Additional forage produced by improved range conditions will be available to improve wildlife habitat and increase big game herd numbers (DLG). Increased cover (sand bluestem grass) will be provided for lesser prairie chickens in the area east of the Pecos River through shinnery oak control.

#### Authority/Constraints

All allotments have been placed into management categories based on initial range condition and trend studies, resource conflicts and potential for improvement as directed in the Final Livestock Grazing Management Policy (Washington Office Instruction Memorandum 82-292). As monitoring studies are completed, final categorization will be established and allotments needing adjustments will be identified.

The Federal regulations that govern changes in allocation of livestock forage provide specific direction for livestock use adjustments (43 CFR 4110.3-1, 4110.3-2, and 4110.3-3). The regulations specify that acceptable data is necessary to make reductions and that permanent increases or suspensions of livestock forage "shall be implemented over a five year period unless after consultation with the affected permittees or lessees and other affected interests, an agreement is reached to implement the increase or suspension in less than 5 years."



Public Law 94-579, The Federal Land Policy and Management Act, Section 401 (b)(1) directs that 50 percent of all monies received as fees for grazing livestock on public lands shall be made available for the purpose of on-the-ground range rehabilitation, protection and improvements. Policies and procedures regarding rangeland improvements are established in the Final Rangeland Improvement Policy (Washington Office Instruction Memorandum 83-27).

The authority and need for CMPs for achieving multiple use objectives is included in the Federal Land Policy and Management Act, Section 402, 43 CFR 4120.2, and the Final Grazing Management Policy .

The Federal Land Policy and Management Act of 1976 also mandates that the public lands be managed in a manner that will provide food and habitat for wildlife. The Final Rangeland Improvement Policy directs range betterment funds to be used to improve forage condition with resultant benefits to wildlife.

### **Standard Operating Procedures**

The following standard operating procedures have been adopted to reduce or eliminate adverse environmental impacts and, where possible, enhance resource values.

1. Range improvements and vegetation treatments will be designed during specific cooperative management plan development. Site-specific impacts from projects will be analyzed in an Environmental Assessment.

2. Selection of specific sites for range improvements will be evaluated to ensure that highly erosive areas are avoided and to insure workability of the project.

3. Where soils and vegetation are disturbed, reclamation measures will be taken, if applicable. These measures include returning the land to as near its natural form as possible and reseeding with mixtures of grass, legumes, and forbs to maintain vegetative cover and prevent erosion.

4. Evaluation, ranking, and budgeting of rangeland improvements will be in accordance with the Final Rangeland Improvement Policy.

5. CMPs will be fully implemented, and an EA covering each CMP will be prepared. The plans will be monitored and evaluated following implementation so that periodic changes, if necessary, can be made on those plans not meeting multiple use objectives. Flexibility in deviating from the normal livestock operation will be provided for in each CMP.

6. Successful grazing programs already implemented by permittees and in use on ranches may be documented and incorporated into a plan.

7. If additional range improvements or vegetation treatments are identified, they will be assessed through the EA process prior to implementation.



8. All application rates of herbicides will be determined based on individual range sites and the conditions at the time of application.

9. Application of herbicides will conform to BLM Manual 9220 and State of New Mexico and U.S. Environmental Protection Agency (USEPA) standards. Herbicides proposed for use will be authorized by the USEPA, the New Mexico Department of Agriculture (NMDA), and the Department of Interior (DOI), and must be registered by the USEPA and NMDA. NMDA restricted use regulations will be consulted prior to any herbicide application.

10. Tractor-mounted root-knives will be used to grub mesquite and cholla. The uprooted mesquite will be left in place after grubbing to provide wildlife habitat. Uprooted cholla will be stacked and left in place or burned, depending on wildlife or other multiple-use needs.

11. In areas of vegetation treatment, livestock grazing would be deferred for a minimum of two consecutive growing seasons. A continual 16 month deferment period may be required in some instances.

12. Prescribed burning will be used primarily for maintenance of alkali sacaton or giant sacaton swales to remove rank and unpalatable growth. Site-specific EAs and burn plans will be developed for any prescribed burns.

13. Before surface-disturbing activities take place, cultural resources will be inventoried and evaluated. All reasonable efforts will be made to avoid adverse impacts on cultural resources. If impacts are unavoidable, BLM will consult with the State Historic Preservation Officer (SHPO) to develop mitigating measures.

14. Prior to the implementation of surface-disturbing activities, paleontological resources will be inventoried and evaluated.

15. The cultural resource program will properly identify those areas which are sprayed with chemical herbicide so that future excavators of those areas will be informed of the possibility of contamination of radiocarbon samples. This information will then become a part of the antiquities permit issued for the excavation of that site.

16. Onsite analysis of areas proposed for inclusion in projected brush control treatments will be made to avoid highly desirable wildlife habitat which would be adversely affected by the treatments being considered.

17. Important wildlife habitat, such as broadleaf tree groves, aquatic and riparian sites, dirt tanks, watering tubs, active raptor nests, and the area around them will be protected during brush control operations. These areas will be protected through the use of nonlethal rates of herbicides, or other means as deemed appropriate by resource specialists. Pseudoriparian areas and most major drainages with perennial streams will be excluded from chemical treatment programs within a distance of 1,320 feet.

18. In areas of shinnery oak control, 20 to 30 percent of existing shinnery will be left for wildlife. The desired percent of uncontrolled shinnery can be attained by either applying the herbicide at a rate designed to achieve 70 to 80 percent kill or leaving interspersed areas of uncontrolled shinnery.



19. A threatened, endangered, State-listed, or proposed-listed species clearance will be conducted by a BLM staff biologist prior to the beginning of any project. If a "may affect" determination is made by the staff biologist, consultation will be undertaken with the agency [U.S. Fish and Wildlife Service (USFWS), New Mexico Department of Game and Fish (NMDG&F), or the New Mexico Natural Heritage Program (NMNHP)] listing the species which may be affected. The results of the consultation will determine the course of action necessary to avoid adverse effects on listed species.

20. Fences designed for construction in big game use areas will meet BLM fencing specification (BLM Manual 1737), unless otherwise authorized. Fences authorized by cooperative agreement or range improvement permits will be subject to modification to achieve management objectives deemed necessary by the authorized officer.

21. New or expanded grazing use and support facilities will be evaluated on a case-by-case basis so that impairment of wildlife habitat will be minimized or eliminated.

22. Where BLM controls water sources, water will be made available to wildlife when livestock are on and off the allotments or pastures; escape ramps will be required in all water troughs and open storage tanks.

23. Areas meeting riparian and wetland habitat criteria will be assessed to determine if protection is needed to provide wildlife habitat. Protection measures will be selected for individual situations to include protective fencing, adjustments in livestock use, and/or establishment of buffer strips, as necessary. Where domestic livestock are excluded from riparian areas, alternate water sources for livestock will be provided.

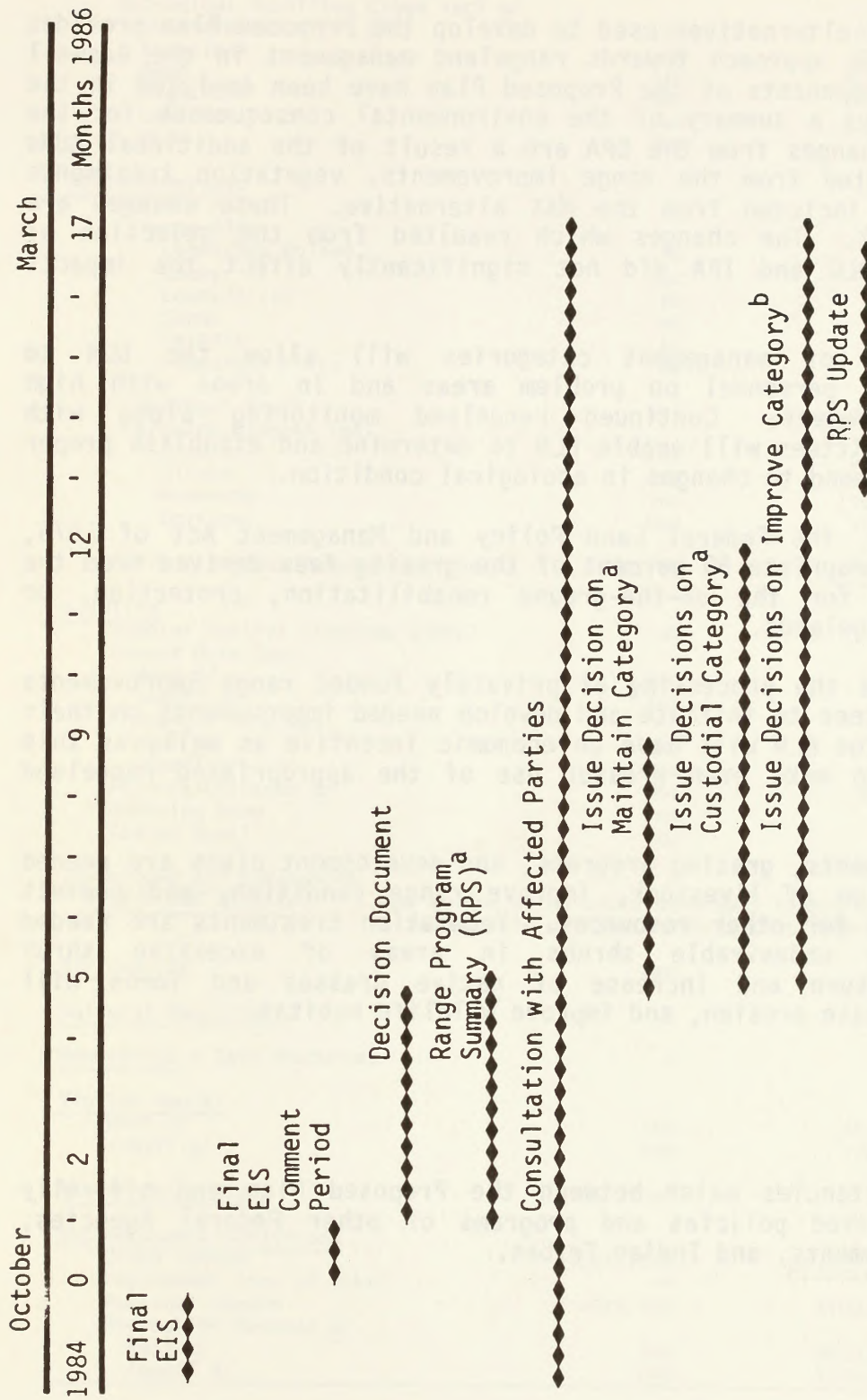
24. An environmental assessment will be prepared prior to the implementation of a Habitat Management Plan.

25. The 1.5 million acre area known as the Antelope Study Area will be managed as described in Chapter 2 of the Draft MFPA/EIS (New Mexico State University Study and recommendations).

## **Implementation**

Figure 1 diagrams the general implementation schedule for the issuance of grazing decisions. BLM investments in range improvements, vegetation treatments, prescribed burns, and grazing programs will begin in Fiscal Year (FY) 1986. Appropriated funds available for investment in range improvements or vegetation treatments shall be allocated according to the BLM's procedures for evaluating, ranking, and budgeting proposed improvements (Washington Office Instruction Memorandum 83-27). Improvements, facilities, or treatments designed specifically to enhance wildlife habitat will be accomplished as special appropriations are made.





<sup>a</sup>If consultation results in substantial changes from actions outlined in the RPS, issuance of decisions will be deferred until after the RPS update.

<sup>b</sup>Decisions requiring more than 17 months to issue will be identified in the RPS update. The RPS update will give the reason for the extended time period and describe further actions needed to issue decisions by a specified date.

FIGURE 1

General Implementation Schedule



## **RATIONALE**

The combination of alternatives used to develop the Proposed Plan provides a balanced multiple-use approach towards rangeland management in the Roswell Resource Area. All components of the Proposed Plan have been analyzed in the DEIS. Table 2 displays a summary of the environmental consequences for the Proposed Plan. The changes from the DPA are a result of the additional AUMs which could be generated from the range improvements, vegetation treatments and grazing programs included from the MAX alternative. These changes are underlined in Table 2. The changes which resulted from the selection of components from the DLG and IPA did not significantly affect the impacts identified in the DPA.

The establishment of management categories will allow the BLM to concentrate funds and personnel on problem areas and in areas with high potential for improvement. Continued rangeland monitoring along with consultation with permittees will enable BLM to determine and establish proper stocking rates and respond to changes in ecological condition.

Public Law 94-579, the Federal Land Policy and Management Act of 1976, directs the BLM to appropriate 50 percent of the grazing fees derived from the District to be used for the on-the-ground rehabilitation, protection, or improvement of the rangelands.

Giving priority to the processing of privately funded range improvements will encourage permittees to initiate and develop needed improvements on their grazing allotments. The BLM will have an economic incentive as well, as this will allow the BLM to make even greater use of the appropriated rangeland improvement funding.

Rangeland improvements, grazing programs, and development plans are needed to improve distribution of livestock, improve range condition, and protect areas with high value for other resources. Vegetation treatments are needed to remove competing undesirable shrubs in areas of excessive shrub composition. The return and increase of native grasses and forbs will stabilize soils, decrease erosion, and improve wildlife habitat.

## **CONSISTENCY**

No known inconsistencies exist between the Proposed Plan and officially approved resource-related policies and programs of other Federal Agencies, State and local governments, and Indian Tribes.



TABLE 2

## ENVIRONMENTAL CONSEQUENCES OF THE PROPOSED PLAN

Resource	Short Term	Long Term
<u>Vegetation</u>		
AUMs	219,695	256,018
Forage Production	NC	11%
Ecological Condition Class (ac) <u>a/</u>		
Undetermined ("C") <u>b/</u>	NC	93,666
Excellent	NC	25,332
Good	Inc	683,427
High Fair	Dec	151,584
Low Fair	Dec	39,402
Poor	Dec	0
<u>Soils/Watershed</u>		
Surface Runoff		
Range Site:		
Loamy/Gyp Upland	NC	NC
Loamy	Dec	-18%
Loamy/Hills	NC	NC
Sandy	NC	NC
Malpais	NC	NC
Limestone Hills	NC	NC
Sediment Yield	Dec	.30 ac ft/sq mi/yr
Erosion Classes (ac)		
Stable	Inc	61,605
Slight	Inc	787,795
Moderate	Inc	131,143
Critical	Dec	12,868
Daily Livestock Consumption (Gals)	219,700	256,000
<u>Wildlife</u>		
Special Habitat Features (SHFs)	NC	NC
Desert Mule Deer		
West <u>c/</u>	Inc	2,100
(east) <u>d/</u>	Inc	518
Pronghorn Antelope		
West <u>c/</u>	Inc	469
(east) <u>d/</u>	Inc	365
Prairie Chickens <u>d/</u>	Inc	3,700
Mourning Dove	Inc	Inc
Scaled Quail	NC	NC
<u>Threatened and Endangered</u>		
<u>Plants and Animals</u>	Any action which could adversely impact a T&E species requires site-specific mitigation to avoid a "may-affect" determination	
<u>Air Quality</u>	Dec	Inc
<u>Cultural Resources</u>	NC	NC
<u>Recreation - Cave Resources</u>	+	+
<u>Visitor Hours:</u>		
West <u>c/</u>	Inc	65,307
(east) <u>d/</u>	Inc	17,335
<u>Visual Resources</u>	Dec	Inc
<u>Socioeconomic Conditions</u>		
Gross Income	\$5,921,318	\$6,523,785
Employment (no. of jobs)	-7	14
Personal Income	-\$45,700	\$102,000
Recreation Revenue <u>e/</u>		
West <u>c/</u>	Inc	\$832,256
(east) <u>d/</u>	Inc	\$116,001

Source: BLM RRA EIS Files

- a/ Short term change is in the number of acres per class  
b/ Condition class as yet undetermined due to the small amounts of public land involved or isolated and scattered tracts  
c/ Resource Area Excluding Chaves County east of the Pecos River  
d/ Chaves County east of the Pecos River  
e/ Dollars/year generated by recreational activities on public land

NC: No change  
+: Beneficial  
-: Adverse  
Inc: Increasing or Improving  
Dec: Decreasing or Declining



ENVIRONMENTAL CONSEQUENCES OF THE PROPOSED PLAN

Category		Description	
Type		Impact	
Air Quality	1	Increased particulate emissions from construction activities.	Minor, temporary increase in local dust levels.
	2	Increased vehicle emissions during peak traffic periods.	Minor, localized increase in air pollution.
	3	Release of volatile organic compounds (VOCs) from storage tanks.	Minor, detectable but not harmful.
	4	Increased energy consumption for lighting and heating.	Minor, increase in greenhouse gas emissions.
	5	Use of solvents and paints during maintenance work.	Minor, controlled by safety protocols.
	6	Increased use of heavy machinery.	Minor, temporary increase in noise and dust.
	7	Storage of construction materials.	Minor, potential for dust and odor.
	8	Increased traffic on local roads.	Minor, wear and tear on infrastructure.
	9	Increased use of fossil fuels for power generation.	Minor, increase in carbon footprint.
	10	Increased use of water for construction.	Minor, localized water consumption.
Water Resources	1	Increased water consumption for construction.	Minor, temporary increase in demand.
	2	Increased use of water for landscaping.	Minor, increase in irrigation needs.
	3	Increased use of water for cleaning.	Minor, localized water use.
	4	Increased use of water for industrial processes.	Minor, increase in wastewater volume.
	5	Increased use of water for domestic purposes.	Minor, increase in household water demand.
	6	Increased use of water for fire suppression.	Minor, increase in fire risk.
	7	Increased use of water for cooling.	Minor, increase in energy demand.
	8	Increased use of water for heating.	Minor, increase in energy demand.
	9	Increased use of water for power generation.	Minor, increase in energy demand.
	10	Increased use of water for transportation.	Minor, increase in energy demand.
Land Use	1	Increased land consumption for construction.	Minor, temporary increase in land use.
	2	Increased use of land for parking.	Minor, increase in parking demand.
	3	Increased use of land for storage.	Minor, increase in storage demand.
	4	Increased use of land for landscaping.	Minor, increase in landscaping demand.
	5	Increased use of land for fire suppression.	Minor, increase in fire risk.
	6	Increased use of land for cooling.	Minor, increase in energy demand.
	7	Increased use of land for heating.	Minor, increase in energy demand.
	8	Increased use of land for power generation.	Minor, increase in energy demand.
	9	Increased use of land for transportation.	Minor, increase in energy demand.
	10	Increased use of land for other purposes.	Minor, increase in demand.
Noise and Vibration	1	Increased noise levels during construction.	Minor, temporary increase in noise.
	2	Increased vibration levels during construction.	Minor, temporary increase in vibration.
	3	Increased noise levels during operation.	Minor, increase in noise levels.
	4	Increased vibration levels during operation.	Minor, increase in vibration levels.
	5	Increased noise levels during maintenance.	Minor, increase in noise levels.
	6	Increased vibration levels during maintenance.	Minor, increase in vibration levels.
	7	Increased noise levels during fire suppression.	Minor, increase in noise levels.
	8	Increased vibration levels during fire suppression.	Minor, increase in vibration levels.
	9	Increased noise levels during cooling.	Minor, increase in noise levels.
	10	Increased vibration levels during cooling.	Minor, increase in vibration levels.
Energy Consumption	1	Increased energy consumption for construction.	Minor, temporary increase in energy demand.
	2	Increased energy consumption for landscaping.	Minor, increase in energy demand.
	3	Increased energy consumption for cleaning.	Minor, increase in energy demand.
	4	Increased energy consumption for industrial processes.	Minor, increase in energy demand.
	5	Increased energy consumption for domestic purposes.	Minor, increase in energy demand.
	6	Increased energy consumption for fire suppression.	Minor, increase in energy demand.
	7	Increased energy consumption for cooling.	Minor, increase in energy demand.
	8	Increased energy consumption for heating.	Minor, increase in energy demand.
	9	Increased energy consumption for power generation.	Minor, increase in energy demand.
	10	Increased energy consumption for transportation.	Minor, increase in energy demand.

Notes: 1. All impacts are considered minor and temporary. 2. Mitigation measures are in place to minimize impacts. 3. The project is designed to be environmentally sound. 4. The project is in compliance with all applicable regulations. 5. The project is a net benefit to the community. 6. The project is a net benefit to the environment. 7. The project is a net benefit to the economy. 8. The project is a net benefit to the culture. 9. The project is a net benefit to the society. 10. The project is a net benefit to the future.



**CONSULTATION**

**AND**

**COORDINATION**







## **Consultation and Coordination**

### **INTRODUCTION**

This chapter summarizes the consultation and coordination conducted in preparation of the Draft MFPA/EIS. A list of preparers is provided in Table 3.

#### **Public Involvement**

Scoping for the Roswell MFPA/EIS originated with the development of a Public Participation Plan and Issue Identification in the summer of 1981. Planning Criteria were developed in the fall of 1981 with input from the public and the District Grazing Advisory Board. Throughout the planning process, Federal, State, and local agencies, special interest groups, and other individuals were contacted. The contacts were made to inform the public about the planning process, to gather resource information, and to identify issues for consideration.

A general notice at the outset of the planning process inviting participation in the identification of issues and a notice inviting public comment on the planning criteria were circulated through Federal Register Notices, news releases, correspondence, and public meetings.

The original concept of developing a multi-issue Resource Management Plan (RMP) was modified when, due to budget constraints, rangeland management was identified as the single issue in the area. The first Federal Register Notice was published in June, 1981. A revised Notice, informing the public of the change from an RMP to an MFPA/EIS was published in March, 1983. Scoping activities are summarized in Table 4.

#### **Agency Coordination**

The Biological Assessment was completed and sent to the Field supervisor for the U.S. Fish and Wildlife Service (USFWS). The final Biological Opinion from the USFWS was received on July 2, 1984. The Biological Assessment and Biological Opinion are presented in Appendix E.

#### **Public Review of the Draft MFPA/EIS**

The Roswell Draft MFPA/EIS was filed with the Environmental Protection Agency on April 13, 1984. The Notice of Availability and Public Hearing were published in the April 18, 1984, Federal Register (Vol. 49, No. 76, pp. 15281-15282). The Draft MFPA/EIS was made available to the public and the 90-day comment period ran from April 20, 1984 to July 19, 1984.

Approximately 450 copies of the Draft MFPA/EIS were distributed to the public and other agencies. A list of the individuals and agencies receiving copies of the Draft document can be found beginning on page 15.



Table 3  
LIST OF PREPARERS

Name	MFP/EIS Responsibility	Education	Years of BLM Experience
Phil Kirk	Area Manager	B.S., Range Management New Mexico State University	22
Linda S.C. Rundell	Team Leader	B.S., Wildlife Science New Mexico State University	5
T. Pat Kelley	Community Planner	B.S., Range Management B.S., Soil Science California State University	4
A. Ray Keller	Range Condition, Range Improvements, Assumptions; Range Monitoring and Inventory Team Leader	B.S., Range Animal Science Sul Ross State University	7
Vicky K. Taylor	Vegetation, Livestock Grazing, Brush Control	B.S., Wildlife Science B.S., Range Science New Mexico State University	3
Michael O. Howard	Wildlife, Chemical Toxicity	B.S., M.S., Wildlife Science Sul Ross State University	5
Joseph B. Hummel	Recreation	B.S., Natural Resources Humboldt State University	8
Clarence Seagraves	Watershed, Air Quality	B.S., Agronomy New Mexico State University	11
James Konopinski	Watershed, Air Quality	B.A., Geography Bowling Green State University	2
E. Ann Ramage	Cultural Resources	B.A., Anthropology University of New Mexico	7
Teodoro Rael	Economics	M.A., Economics New Mexico Highlands University	6
Larry LaPlant	Pronghorn Antelope Study	B.S., Wildlife Management University of Montana	5
Angelina Medina	Support	Del Norte High School Albuquerque	3
Linda S. Hewitt	Support	B.S., English Eastern New Mexico University	1
Helen C.J. Miller	Support	B.S., Psychology University of New Mexico B.S., Wildlife Science New Mexico State University	3
Illustrators: Front Cover Interior Sketches	Roy Stovall Terry Keim		



## Comments and Responses

During the 90-day public comment period (April 20 through July 19, 1984), 10 letters from the public and agencies were received. Four comment letters were received after the 90 day comment period had passed. All letters have been reproduced in their entirety, and responses made where required. Individuals or organizations who sent letters are listed in Table 5.

Responses have been made to all substantive comments presented in the letters. Substantive comments were considered to be those which addressed either the adequacy and accuracy of the Draft MFPA/EIS or the merits of the alternatives or both. The responses are presented adjacent to the comments in each letter beginning on page 19.

TABLE 4  
SCOPING ACTIVITIES

Method of Contact	Date	Location
Federal Register Notice	6/25/81	
Public Meetings:	7/21/81	Portales
	7/21/81	Clovis
	7/22/81	Tucumcari
	7/22/81	Santa Rosa
	7/23/81	Fort Sumner
	7/27/81	Roswell
	7/28/81	Carrizozo
	7/31/81	Ruidoso
Meetings:		
Southeastern NM Grazing Association	8/12/81	Roswell
District Grazing Advisory Board	8/19/81	Roswell
Advisory Council	10/7/81	Roswell
General Public	10/1/82	Roswell
Federal Register Notice	3/10/83	
Request for Public Comment - letter	3/14/83	
Meetings:		
General Public	3/30/83	Roswell
Southeastern NM Grazing Association	4/18/83	Roswell
Advisory Council	5/12/83	Roswell
Planning Update - letter	7/27/83	
District Grazing Advisory Board	8/23/83	Roswell

### Public Hearings on the Draft MFPA/EIS

Two public hearings were held on the Draft MFPA/EIS in Roswell on June 15, 1984. Four individuals testified at the afternoon hearing; no comments were received at the evening session. Testimony received at the hearing and BLMs responses to the comments are presented beginning on page 50. Complete transcripts are available for public review at the Roswell District Office, 1717 W. Second Street, Roswell, New Mexico.



TABLE 5  
COMMENT LETTERS RECEIVED

NUMBER	RECEIVED FROM
1	NM State Engineer Office
2	NM Office of Cultural Affairs
3	US Federal Aviation Administration
4	Wildlife Management Institute
5*	USDI Bureau of Mines
6	NM Natural History Institute
7	NM Wildlife Federation
8*	USDI National Park Service, Southwest Region
9	NM Department of Agriculture
10	SENM Grazing Association; NM Cattlegrowers Association; NM Public Land Council; Roswell District Grazing Advisory Board
Comments Received after the 90-day Official Comment Period	
11*	US Fish and Wildlife Service
12	Wildlife, Range, and Water Management, Inc.
13	USDA Soil Conservation Service
14*	US Environmental Protection Agency

\* Indicates letters not requiring a response.

TABLE 6  
PUBLIC HEARINGS SPEAKERS

NAME	AGENCY OR ORGANIZATION REPRESENTED
John M. Fowler	New Mexico State University-Range Improvement Task Force
Bud Eppers	Southeastern New Mexico Grazing Association; New Mexico Cattle Growers; New Mexico Public Land Council; New Mexico Wool Growers, Inc.; Roswell District Grazing Advisory Board
Thor Stephenson	New Mexico Department of Agriculture
Bill Ball	New Mexico Soil and Water Conservation District



ROSWELL RESOURCE AREA DRAFT MFP-A-EIS

MAILING LIST

Congressional Offices and NM State Legislators

US Senator Jeff Bingaman  
US Senator Pete Domenici  
US Congressman Joe Skeen  
US Congressman Manuel Lujan, Jr.  
State Senator Joe Gant  
State Senator Timothy Jennings  
State Senator Bud H. Hebert  
State Representative Robert B. Corn  
State Representative Tandy L. Hunt  
State Representative Richard Knowles  
State Representative Marvin B. "Mickey" McGuire

City Offices

Carlsbad  
Clovis  
Eunice  
Jal  
Portales  
Roswell  
Tucumcari  
Town of Tatum  
Village of Ft. Sumner, Inc.

Federal Agencies

Department of Agriculture  
Agricultural Stabilization  
& Conservation Service  
Lincoln National Forest  
Soil Conservation Service  
Department of the Army  
Corps of Engineers  
Department of the Interior  
Bureau of Indian Affairs  
Bureau of Land Management  
Bureau of Mines  
Bureau of Reclamation  
National Park Service  
Carlsbad Caverns & Guadalupe Mountains  
National Park  
Fish and Wildlife Service  
Environmental Protection Agency  
Office of Public Awareness

State Agencies

Crop & Livestock Reporting Board  
Department of Agriculture,  
Dr. Wm. Stephens, Director  
Department of Finance & Administration  
Department of Game & Fish  
Eastern Plains Council of Governors  
Environmental Improvement Division, Dist. 4  
Governor's Office  
Highway Department  
Historical Preservation Bureau  
Land Office, Jim Baca, Commissioner  
Museum of NM Laboratory of Anthropology  
Oil Conservation Division  
Parks Commission  
Soil and Conservation Commission  
State Engineer  
State Planning Office  
Water Resources Division, Dist. 2

County Offices

Chaves	Lea	
Curry	Lincoln	<u>Libraries</u>
Eddy	Roosevelt	ENMU
DeBaca	Quay	ENMU-R
Guadalupe		NMSU

Non-Government

Aubrey S. Johnson  
Carlsbad Sportsmens Club  
Central NM Audubon Society  
Chaves County Wildlife Federation  
Dr. Katherine A. Green-Hammond  
Environmental Impact Services  
Environmental Management Services Company  
Federal Land Bank of Roswell  
Gulf Oil Corporation  
Lea County Wildlife Federation  
Middle Rio Grande Conservation District  
National Council of Public Land Uses  
Natural Resources Defense Council  
Nature Conservancy  
New Mexico Beef Council, Rick Shaw  
New Mexico Wildlife Federation  
New Mexico Farm and Livestock Bureau  
New Mexico Field Office, The Nature Conservancy  
New Mexico Natural History Institute  
New Mexico Public Lands Council  
New Mexico Rural Water Users Association, Inc.  
New Mexico Stockman, Editor  
New Mexico Woolgrowers, Inc.  
Public Lands Council, National Cattlemen's Assn.  
Public Lands Institute  
Public Service Company of New Mexico  
Southeast New Mexico Grazing Association  
Southeast New Mexico Audubon Society  
Southwestern Public Service Company  
Sierra Club, Rio Grande Chapter  
Society for Range Management  
The Outdoor Reporter, Editor  
Tom Arrandale  
Dr. Sam Beason  
Wildlife Management Institute

Universities

New Mexico State University,  
College of Agriculture and Home Economics  
Dr. Arnold Nelson, Department of Animal  
and Range Science  
Dr. Charles A. Davis, Department of Fishery  
and Wildlife Science  
Dr. James, E. Knight, Cooperative Extension Service  
Dr. Jerry G. Schickedanz, Range Improvement  
Task Force  
Texas Tech University, Dept of Range & Wildlife Management



ROSWELL RESOURCE AREA DRAFT MFPA-EIS MAILING LIST (continued)

District Advisory Council/  
Grazing Advisory Boards

Armstrong, Robert G.  
Atkinson, Herb  
Bail, Wm. J.  
Berry, Daniel C.  
Byrd, James L.  
Corn, Bronson  
Draper, Mark  
Eppers, Bud  
Greenwoods, Hart M.  
Hamil, Gene  
Treat, W.C.  
Walls, James R.  
Watts, Marvin L.  
Watts, Sonny  
Wood, Jerry E.

Ranch Operators

Adams, Clarence  
Anderson, Michael  
Armstrong, Robert G.  
Armstrong, G. G.  
Arroyo Seco, Inc.  
Atkins, Hubert  
Avants, Alma  
Ball, William J.  
Bar W Ranch, Inc.  
Bedford, H. G.  
Benedict, E. N.  
Bird Ranch  
Blackwell, E. Clyde  
Blakey, Bill B.  
Block Dot Ranch, Inc.  
Bond, E. T. Dimmitt  
Brady, Mrs. W. H.  
Brassell Brothers  
Brown, Dale W.  
Brown, B. L. & R. C.  
Bryan, Edward O.  
Burguette Bros.  
Byrd, Bob H.  
Byrd, Suelena  
Campos, Emerenciano  
Campos, Pelaglo  
Carruthers, Odell  
Casarez, Rosendo  
Chavez, Ernesto  
Chavez, Manuel Sr.  
Chavez, Paul M.  
Chesser Ranch, Inc.  
Childress Ranch  
Circle F Ranch, Co.  
Cilett, James  
Connell Ranches, Inc.  
Cooper, Mrs. Joyce M.  
Cooper, Thomas S.  
Cordova, Amelia K.

Ranch Operators

Corn, Bronson  
Corn Brothers Trust  
Corn, Fred B. & Sons  
Corn, Herbert  
Corn, James  
Corn, Mike W.  
Corn, Poe Est.  
Corn, Ruth  
Corn, Tom  
Corn, W. H. Est.  
Cortese, Joe  
Crenshaw, Robert  
Daniels, J.W. Est.  
Davidson, Jack Jr.  
Davis, A. E. Sr.  
Davis, H. H.  
Dean, Charles & Betty  
Diamond A Cattle Co.  
Diamond L Ranch, Inc.  
Draper, Mark R.  
Dunlap, Tom  
Edgar, William J.  
El Yeso Ranch Co.  
Eldridge, Grady  
Elliott, Helen N.  
Eppers, H. W., Jr.  
Erramouspe, Inc.  
Ewart, James P.  
Fen Met Co.  
Flores, Alfredo  
Fresquez, Lutarlo  
Garcia, Jose M. Est.  
Gates, Albert  
Gibbons, J. P. Trust  
Gist, Fred & Velma  
Glass, David  
Glenn, William E.  
Gnatowski, A. W.  
Gomez, Marie Pacheco  
Good Ranch Trust  
Gooding Ranch  
Gunter, Roy Jr..  
Gutierrez, Annie Est  
Hage and Webb Land  
Hall-Gnatowski, Inc.  
Harkey, Howard  
Harkey, Jack N.  
Helms, A. D.  
Henderson, Matthew  
Hendricks, Wilda K.  
Hicks, John L.  
Henry, Clifford C.  
Hightower Land & Cattle  
Hindl Sheep & Cattle  
Hisel, Don L.  
Hnulik, Ellis  
Horney, Zola G.

Ranch Operators

Hornsby Land & Cattle  
Hunt, Clay  
Jackson, Leland C.  
Jackson, Carroll Est.  
Johnson, B. A. Est.  
Johnson, Carl  
Johnson, S. P. Jr.  
Johnson, W. F. Estate  
Jones, Preston  
Kelly, Kap  
Key, Marvin  
Killough, Alan Joe A  
Knight, Thomas A.  
Leftwich, J. R. Est.  
Liakos, William G.  
Lietzman, Robert W.  
Lopez, Julian  
Lovelace, W. R.  
Lucero, Benerito  
Lynch, Gary  
Marley, Clyde and Robert  
Marley Ranches, Ltd.  
Marley, William T. F.  
Marleys Gallo Ranch.  
Martin, Jerry Don  
Martinez, Solomon P.  
McBrayer, A. J.  
McCabe, Silas  
McCall, Hobby  
McCan, Mike  
McCarty, William G.  
McDaniel, W. W. Est.  
McDonald, Laura Est.  
McInnes & Fuchs  
McKnight, Douglas  
McKnight, Joe W.  
McKnight, J. P.  
McKnight, W. D.  
McLean, Mrs. Ella S.  
McNally, Inc.  
McTeigue, Jimmy  
Mendiola, Peter  
Merritt, J. L.  
Merritt, Ronald L.  
Metcalf, L. E. Est.  
Miles - Langenegger  
Miller, Bertha C.  
Mitchell, Tom  
Moats, Betty Jean  
Mooney, F. Olin Sr.  
Morris, Leon  
Nalda, John  
Newton, Doyle  
Northcutt, Elmer  
Nunez, R. C.  
One Hundred Ranch  
Overton, Tyne E.



ROSWELL RESOURCE AREA DRAFT MFPA-EIS MAILING LIST (Continued)

Ranch Operators

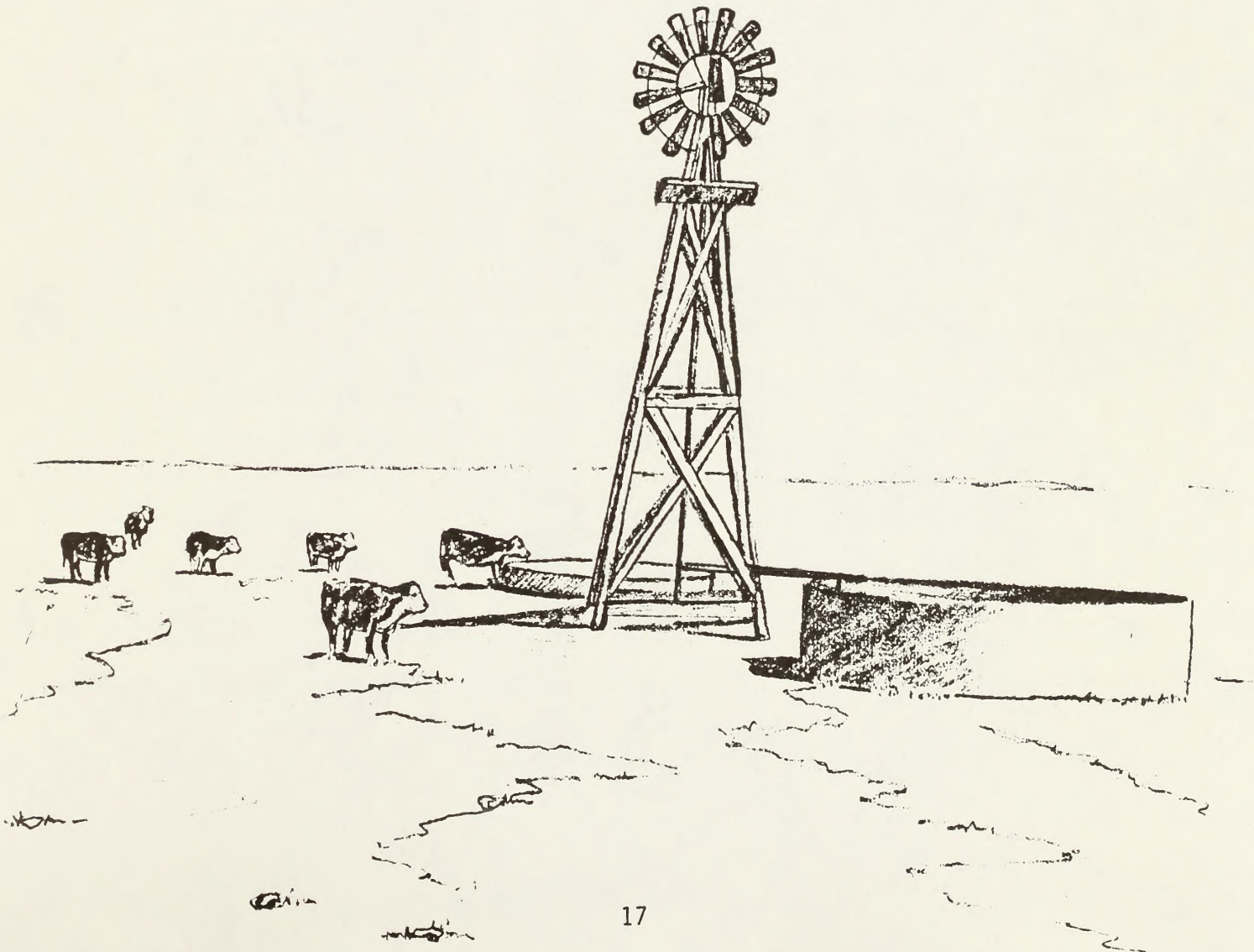
Pacheco, L. A.  
Padilla, Jose F.  
Parker - Townsend  
Pastura Ranch  
Peacock, Ruben  
Pendery, Mrs. Clinton  
Perez, Eugene Jr.  
Perez, Raymond  
Perschbacher, J. A.  
Pierce, Truman  
Pittman, Bobby L.  
Price, George  
Procter, Floyd  
Rafter X, Inc.  
Ramon Perez Ranch  
Reilly, Ltd.  
Roadrunner Ranches  
Rogers Ranch  
Roller, Grace  
S Bar J Ranch, Inc  
S and S Corporation  
Sacra, Glaze  
Salz, Luis  
Salas, Danney  
Sanchez, Abelino E.

Ranch Operators

Sanchez, Alfredo  
Sanchez, Arsenio  
Sanchez, Felipe Jr.  
Sawyer, Fern  
Sena, Martin T.  
Shanks Bros., Inc.  
Shrecengost, Margaret  
Sidwell, G. B.  
Sisneros, George  
Slayton, Paul  
Smith, A. D.  
Smith, Frank J.  
Spool Cattle Co.  
Stephenson Ranch, Inc.  
Stevenson, C. A. & Max  
Studdard, Jack  
Sultemeler, Clint  
Sultemeler, Ernest  
Sultemeler, Frank  
T - 7S Ranch, Inc.  
Tapla, Arturo  
Tapla, Edmundo  
Tapla, Erlindo  
Tapla, Placido  
Taylor, Bennie R.

Ranch Operators

Teel, Fred  
Thompson, M. G.  
Thompson, Melville D.  
Townsend, Henry  
Townsend, Gayland  
Tucker, Finus Trust  
Tucker, Thomas E.  
Van Eaton, Fred  
Vaughn Enterprises  
Wagner, Charles & Betty  
Washburn, Lorena W.  
Whipple, Ray A.  
White, J. Phelps III  
White, Joe H.  
Wiggins, Bill  
Williams, S.S.  
Wilson, Charles P.  
Winn, Madison A.  
Withers Ranch  
Womer, Paul E.  
Woodys Acres, Inc.  
X-Bar Ranch, Inc.  
Yrlart, Robert M.  
Z. R. Hereford Ranch









**COMMENTS  
AND  
RESPONSES**









RECEIVED

MAY 7 10 39 AM '84

STATE OF NEW MEXICO  
BUREAU OF LAND MANAGEMENT  
POST OFFICE DRAWER 1857  
ROSSELL, NEW MEXICO 88201

STATE OF NEW MEXICO  
STATE ENGINEER OFFICE  
SANTA FE

BATAAN MEMORIAL BUILDING  
STATE CAPITOL  
SANTA FE, NEW MEXICO 87303

MAY 1, 1984

S. E. REYNOLDS  
STATE ENGINEER

Mr. Earl R. Cunningham  
District Manager  
Bureau of Land Management  
Post Office Drawer 1857  
Roswell, New Mexico 88201

Dear Mr. Cunningham:

With your letter of April 20, 1984, you enclosed for review and comment a copy of the Draft Management Frame Work Plan Amendment/Environmental Impact Statement for the Roswell Resource Area. We have only one comment.

Map D-d titled "Declared Underground Water Basins" should be modified to include the Tucumcari Underground Water Basin. A map of the current Declared Underground Water Basins is attached.

Sincerely,

S. E. Reynolds  
State Engineer

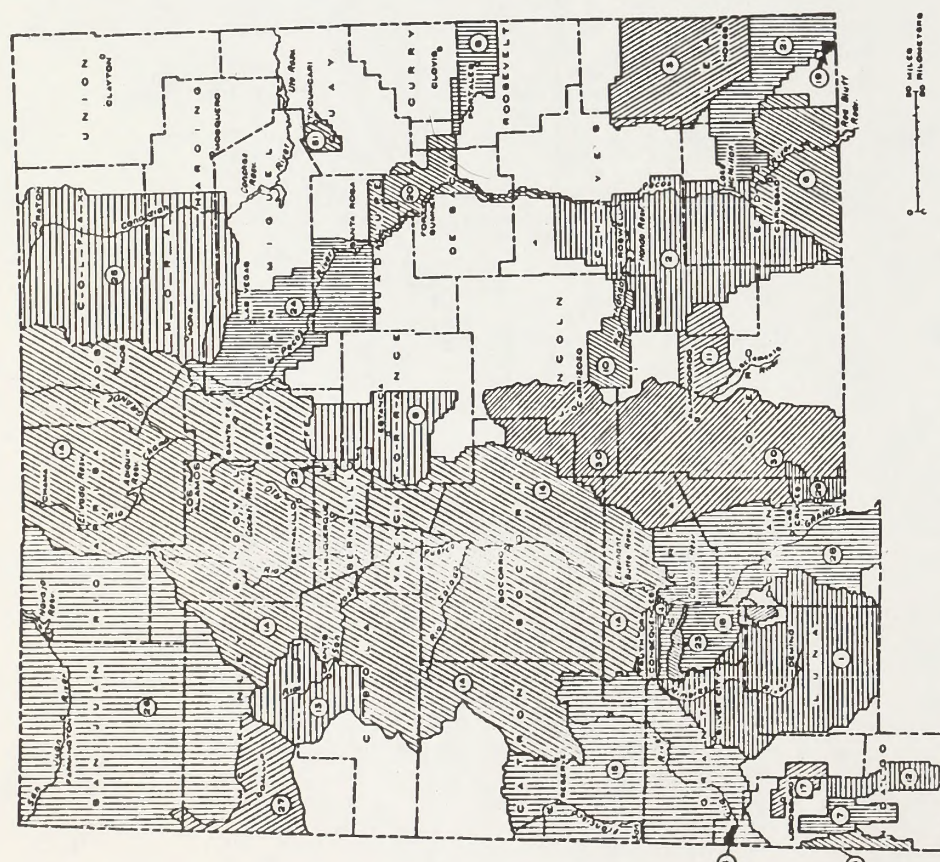
By

Fluid L. Martinez, Chief  
Technical Division

FLM:pat  
Attachment

cc: SFO Roswell District Office





DECLARED UNDERGROUND WATER-BASINS IN NEW MEXICO

BASIN		AREA IN SQUARE MI.	AREA IN SQUARE KI.
1	MIMBRE VALLEY	4,276	2,798
2	ROSWELL	4,281	2,798
3	LEA COUNTY	2,180	1,398
4	HOT SPRINGS	284	183
5	VIRGEN VALLEY	18	12
6	CARLSBAD	1,089	700
7	ANIMAS	488	315
8	ESTANCIA	1,724	1,108
9	PORTALES	828	528
10	MONROE	311	200
11	PENASCO	729	469
12	PLAYAS VALLEY	518	334
13	BLUWATER	1,318	848
14	RIO GRANDE	20,208	13,172
15	GUAY-BAN FRANCISCO	8,959	5,685
16	SAN SIMON	388	249
17	LOREBURG VALLEY	388	249
18	NUTT-HOCKETT	188	120
19	JAL	12	8
20	FORT SUMNER	1,088	700
21	CAPTAN	1,880	1,200
22	SANDIA	78	50
23	LAS ANIMAS CREEK	181	114
24	UPPER PECOS	9,708	6,234
25	CANADIAN RIVER	9,888	6,384
26	SAN JUAN	8,787	5,634
27	GALLUP	1,488	954
28	LOWER RIO GRANDE	9888	6,384
29	HUECO	388	249
30	TULAROSA	9,070	5,884
31	TUCUMCARI	172	110
		94,488	60,488

State Engineer of the State of New Mexico  
Bureau No. 2, Amendment No. 17





STATE OF NEW MEXICO  
OFFICE OF CULTURAL AFFAIRS  
HISTORIC PRESERVATION DIVISION

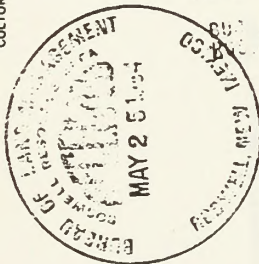
VILLA RIVERA, ROOM 101  
228 EAST PALACE AVENUE  
SANTA FE, NEW MEXICO 87503  
(505) 827-8320

TONY ANAYA  
GOVERNOR

THOMAS W. MERLAN  
DIRECTOR

May 21, 1984

JILL Z. COOPER  
CULTURAL AFFAIRS OFFICER



RECEIVED  
MAY 24 10 23 AM '84

Mr. Earl Cunningham  
District Manager  
Bureau of Land Management  
Roswell Resource Area  
P.O. Drawer 1857  
Roswell, NM 88201

Dear Mr. Cunningham:

Thank you for the opportunity to review the Draft Management Framework Plan Amendment/Environmental Impact Statement for the Roswell Resource Area, dated February 1984, as forwarded in your letter of April 20, 1984.

A brief overview of existing cultural resource information for the Roswell Resource Area was provided on pages 2-22 of the draft EIS. I note that the BLM's Class II sample survey of the Abo Gas Field north of Roswell is scheduled for completion in 1984. I look forward to reading the report, and commend BLM for its efforts to synthesize the data available from the often small-scale archaeological inventories in the area, and to amplify this with additional larger-scale survey. The results of this project should further define cultural resource management needs in the resource area.

The draft EIS outlines several alternative resource management proposals, and provides a reasonable analysis of the varied impacts which may be anticipated to cultural resources. I note on pages 1-19 that BLM's standard operating procedures for surface-disturbing activities will call for prior cultural resource inventory, evaluation, and avoidance or mitigation of adverse impacts. As indicated on pages 1-19, if impacts are unavoidable, BLM will consult with this office to develop appropriate mitigating measures. In the final EIS, BLM should indicate the legal and regulatory basis for these compliance procedures (the National Historic Preservation Act of 1966 as amended and implementing regulations including 36 CFR 800, BLM Procedural Manual 8111, and the statewide Programmatic Memorandum of Agreement (PMOA) between this office, BLM, and the Advisory Council on Historic Preservation (NMSO-168), indicating agency intent to comply with such regulations and procedures.

As noted in the draft document, several range management procedures such as brush control, have the potential to impact cultural resources. Under some circumstances, use of chemical herbicides may also contaminate radiocarbon



Mr. Earl Cunningham  
May 21, 1984  
Page Two

dating samples. However, the EIS indicates that such contamination may be removed during laboratory analysis if the archaeologist and radiocarbon laboratory are notified of the potential contamination. BLM's proposal to include such notification as standard procedure for excavation permit issuance for sites on previously-sprayed areas appears to be an appropriate and prudent measure. However, the final EIS should include a letter from a radiocarbon laboratory indicating whether any additional measures may be needed to compensate for possible contamination. Otherwise, there is risk of losing valuable chronometric information in the area where there are few other temporal indicators.

Regarding impacts which may be associated with controlled burns, the EIS indicates that areas along draws may receive particular impacts from fire suppression, and that prior archaeological inventory may be needed. It should be noted that such fire-planning activities are subject to standard consultation procedures pursuant to the statewide agreement, NMSO-168. The final EIS should also address the possibility of charcoal contamination and increased site erosion as impacts which may be associated with controlled burns. In its range management procedures, BLM might also consider nominating some of the more significant properties in the resource area to the National Register of Historic Places, in accordance with the federal responsibilities established in Section 110 of the National Historic Preservation Act as amended.

I appreciate the opportunity to review the draft EIS, and look forward to seeing the final document. If you have any questions, please do not hesitate to call.

Sincerely,

*Thomas W. Merlan*

Thomas W. Merlan  
State Historic Preservation Officer

TWM/NEW/bc

The Las Cruces/Lordsburg EIS was used as a reference for the section on the impacts of chemical brush control on cultural resources and for the standard operating procedures (See page 3-24 of the Draft).

## 2.1

Controlled burns are used to control the growth of alkali-sacaton, a grass which tends to grow in alluvial deposits. Because of the alluvial nature of the areas that will be burned, the occurrence of an archeological site on the surface is not a strong possibility. Most likely, it would have been buried by the alluvial deposits. Therefore, there is only a slight possibility of charcoal contamination from the controlled burns.

## 2.2

As stated in the soils section (See page 3-17 of the Draft) there is a possibility of increased runoff after a controlled burn. However, since storms producing runoff are not common during the preferred times of treatment, increased erosion is not a strong possibility.





U.S. Department  
of Transportation  
Federal Aviation  
Administration

14 JUN 1984

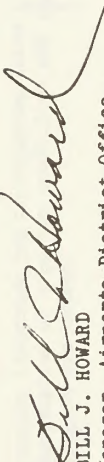
Mr. Earl Cunningham  
District Manager  
Bureau of Land Management  
P. O. Drawer 1857  
Roswell, NM 88201

Dear Mr. Cunningham:

We have reviewed your draft report entitled "Management Framework Plan Amendment/Environmental Impact Statement - Roswell Resource Area," and find no mention of the potential use of a portion of the Fort Stanton property as a site for the proposed Sierra Blanca Airport. At the request of Secretary of Interior Clark, we are preparing to undertake an environmental assessment of such an airport on Site B which involves a portion of the Fort Stanton property.

Therefore, we request that you defer any actions on management of property which would be impacted by such an airport pending the completion of the environmental assessment. Appropriate Department of Interior offices will be actively involved in the preparation of the assessment. We look forward to working with you on this project.

Sincerely,

  
BILL J. HOWARD  
Manager, Airports District Office



AIRPORTS DISTRICT OFFICE  
2930 Yale, SE., Room 109A  
Albuquerque, NM 87106

3 The MPA/EIS includes no proposed actions which would affect or impede the potential development of any facilities at the Ft. Stanton Agricultural Experiment Station.



Edward Warren, For the Director, A-1011





# Wildlife Management Institute

Suite 725, 1101 14th Street, N.W., Washington, D.C. 20005 • 202/371-1808

DANIEL A. POOLE  
President  
L. R. JAHN  
Vice President  
L. L. WILLIAMSON  
Secretary  
WESLEY M. DIXON, Jr.  
Board Chairman

June 27, 1984

Ms. Linda S. C. Rundell  
EIS Team Leader  
Bureau of Land Management  
Roswell Resource Area  
P.O. Drawer 1857  
Roswell, New Mexico 88201

Dear Ms. Rundell:

The Wildlife Management Institute is pleased to comment on DRAFT MANAGEMENT FRAMEWORK PLAN AMENDMENT ENVIRONMENTAL IMPACT STATEMENT, ROSWELL RESOURCE AREA, New Mexico.

24 The titles of the alternatives are confusing. The alternative labeled "Proposed Action" is only the present situation and is for comparison with other alternatives. The "District Preferred Alternative" is really the proposed action.

We prefer the decreased livestock grazing alternative. It provides almost as much wildlife benefit as the DPA, but has none of the expense of range improvements and land treatment.

While deer and antelope percentages show a high percentage increase from the present situation, the populations are low and we really talk about only 218 more deer and 146 more antelope with an expenditure of nearly a million dollars. We think grazing reductions on the poor lands as described in the Decreased Grazing Alternative is in keeping with national goals to reduce the deficit. Otherwise the ranchers will receive a greatly increased subsidy (from range improvements) paid for by all the citizens of the country.

The statement is made that all proposed developments are cost efficient. We do not agree. We were unable to locate any mention of the cost of proposed development. However, page C-8 lists costs per mile, acre, etc. We used those to compute what the proposed developments will cost.

It is difficult to reconcile exact costs of proposed range improvements, because precise figures are not given on page C-8 for water developments. The range is \$700 for water location (tub) and \$9,000 for water storage. Based on those extremes, the cost could range from \$902,449 to \$1,217,894. This does

4.1 The Proposed Action (PA) alternative was labeled in compliance with Washington Office Instruction Memorandum 82-650, dated September 3, 1982, which directed that (for all grazing EIS's) initiated during and after FY 1983 the proposed action shall be the continuation of the present management situation based on the permittee's or lessee's active preference, previous year's licensed use, or average actual use.



Ms. Linda S. C. Rundell

-2-

June 27, 1984

not include 153,820 acres of oak control or a 650 acre controlled burn. All of this is earmarked for 38 improvement allotments giving an average subsidy of either \$23,748 or \$32,048 to each of them.

The improvements and treatment will create 17,372 new AUM. These will cost either \$52 or \$70 each. The annual grazing fee of \$1.37 per AUM will not pay 8% annual interest of \$4.16 on even the lesser of these. We see no reason why all should pay to benefit the few when reductions will accomplish much the same ends.

The BLM range creates 195 jobs and income of \$591,000, while recreation in the same area presently produces \$759,273. p. 3-8.

Total livestock in the area produces \$10,900,000 (BLM is \$591,000 of this) and total income for the 7 county area is \$319,715,510. p. 2-27. There is no reason range livestock should dominate land use or be so heavily subsidized.

Specific comments follow:

Page 2-30, 2nd paragraph. If an animal unit on BLM is worth \$1,200 commercial value, what is an AUM worth? Nowhere did we find a discussion of length of grazing season.

Page 2-30, 3rd paragraph. On the resource area, when the allowance is made for depreciation from total sales, returns to operator labor, management and capital is reduced to a total net income of minus \$1.5 million.

Page 3-2, #11. We are concerned about any cooperative management programs. They give much power to private ranchers on public lands. We must remember New Mexico is the only state where hunters and anglers are required to pay (through New Mexico Game and Fish Department) for use of state lands to avoid a lock up of these lands by livestock lessees. The same thing will be tried on federal lands unless a strict federal control is maintained.

Page 3-19, 2nd paragraph. Present livestock use on riparian areas would continue under DPA. Much more description of riparian conditions and a greatly improved riparian management program are needed.

These remarks have been coordinated with William B. Morse, the Institute's Western Representative.

Sincerely,

*Daniel A. Poole*

Daniel A. Poole  
President

DAP:mam

4.2

The \$1.37 grazing fee is per Animal Unit Month (AUM); annual grazing fees are computed on the number of months used, for example: 1 cow yearlong = \$1.37 x 12 months or \$16.44 annually. Federal regulations direct that 50 percent of all monies received as fees for grazing shall be made available for the purpose of on-the-ground range rehabilitation, protection, and improvements (P.L. 94-579).

4.3

One Animal Unit (AU) is equivalent to 12 AUMs; the "commercial" value of one AUM (in the WPA/EIS area) is approximately \$100.00. Livestock grazing in the Roswell Resource Area is generally on a yearlong basis (see page 1-15 of the DEIS).

4.4

Page 2-30 of the DEIS has been corrected from minus \$1.5 million to \$1.5 million.

4.5

As discussed on page 2-12 of the Draft, existing data shows riparian habitat to be in fair to good ecological condition. A more intensive inventory and evaluation of riparian systems is in progress. Three areas have been excluded from livestock grazing. Other areas will be assessed for protection as described under the SOP on page 6 of the FEIS.





United States Department of the Interior

BUREAU OF MINES

P. O. BOX 25086  
BUILDING 20, DENVER FEDERAL CENTER  
DENVER, COLORADO 80225

Intermountain Field Operations Center

July 3, 1984

JUL 6 1984

Memorandum

To: Phil Kirk, District Manager, Roswell Resource Area, Bureau of Land Management, P.O. Drawer 1857, Roswell, New Mexico 88201

From: Chief, Intermountain Field Operations Center

Subject: Review of the Draft Management Framework Plan Amendment Environmental Impact Statement on Rangeland Management in the Roswell Resource Area, New Mexico

The Bureau of Mines primary interest is the effect a project such as this may have on the mineral resources in the area. Because the proposed action is the continuation of current management practices (no action) the Bureau has no comment on the document as presented.

*Donald P. Blasko*  
Donald P. Blasko



# NEW MEXICO NATURAL HISTORY INSTITUTE

A nonprofit corporation

St. John's College Campus  
Santa Fe, New Mexico 87501

4 July 1984

Phil Kirk, Area Manager  
Roswell Resource Area  
P.O. Drawer 1857  
Roswell, New Mexico 88201



Dear Mr. Kirk:

Astonishment is a sane ecologist's only possible response to your claim (EIS p. 1 and elsewhere) that only 2% of the rangeland is in poor condition. In 1979, when we looked over possible sites for a grassland wilderness or natural area in the Roswell Resource Area, we found snakeweed and fluffgrass. On plains west of the Pecos we could find no roadless area in the Bureau's inventory that had anything like natural shortgrass communities. A century of livestock grazing--high in stocking level and unnatural in timing--has changed the landscape from that described by early travelers.

The Bureau is not the Park Service and cannot be expected to chuck other goals in order to work toward that primeval condition. But in our opinion the "preferred" alternatives--FA, DPA, and IPA--are timid, do-nothing responses to snakeweed's conquest of the Bureau's shortgrass lands in southeastern New Mexico. Where in the preferred alternatives are there proposals for

- 1) large-scale time-controlled grazing trials ("Savory method" and its variants)?;
- 2) large-scale reservations of rangeland for temporary no-grazing or occasional intense-but-brief grazing, each to be followed by fire when litter accumulation permits?;
- 3) other real attempts to get the shortgrasses back--not just the temporary shift that herbicides will give?

Judged by such goals, only the Decreased Livestock Grazing (DLG) plan shows any guts. But mere decreases won't do much in a rancher's lifetime: active chemical or fire control of brush, followed by seeding in the worst areas, is called for, in addition to an immediate drop in stocking levels to well within the land's carrying capacity.

The disadvantage of our proposals is of course cost--fewer head on the land for years, plus active management costs. Worst are the social costs: there are allotments that should go out of business for now. But now may be a less bad time than others: some of those ranches are losing money already, even when supported by government forage at 1/3 market price and by other subsidies.

Well, the Bureau has never tried to restore grassland on the scale that we propose above, and terms can't do so in today's political climate. Let me shift to a more modest proposal related to this Institute's goals and to the basic law governing Bureau operations.

The Roswell District manages far more Southern Plains Grassland than does any other public agency anywhere. For base-line rangeland data as

The ecological condition classes presented (see page 2-4 of the Draft) indicates the percent of vegetation which is present in a range site as compared to its potential. The presence of such species as snakeweed and fluffgrass does not necessarily indicate poor range condition. Range condition studies completed in 1982 indicated that 2% of the rangeland was in poor condition. These findings will be verified during the ongoing monitoring process. A representative sample of our range condition inventory on 135,000 acres indicates that 83 percent of the total vegetation found on 10 "M" Category allotments is made up of desirable shortgrass vegetation. "1" category allotments for the most part have much lower percentages of desirable shortgrass and therefore have been given priority for improvement practices in the proposed plan.

See page 1-9, 1-12, 1-15 of the Draft under the PA, "Existing active AMPs would be maintained ... currently four high-intensity-short duration grazing systems ("Savory Grazing Method" or derivative) are being implemented in the RRA; page 1-10, under the DPA, the fifth paragraph discusses grazing programs as one component of the alternative; page 1-13, last paragraph, discussed grazing programs as a component of the MAX alternative; page 1-18, under Grazing Programs line 9, "Development of individual plans would not be done until after the filing of the EIS ....".

The Ft. Stanton Natural Area contains 3500 acres of mountain grassland which is not available for livestock use. Grazing programs, as discussed in 6-2, can include deferred, rest-rotation systems or high-intensity short-duration. Other than the prescribed burning of sacaton or tobosa swales, the fire management program in the RRA consists of suppression of natural-caused range fires.

Projected changes in ecological condition classes (see Tables 3-3, 3-11, 3-23, 3-33, 3-43, 3-54) reflect improvement or deterioration of the acreage in that class. These changes would result from the actions described under each alternative, which would include, but is not limited to, the use of herbicides. Past studies have shown that grazing systems alone or the exclusion of livestock will not return a brush-invaded area back to a grassland state. The use of herbicides will bring about the initial change back to native grassland. Grazing systems will be used to help prevent the re-infestation of brush species.

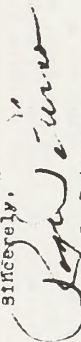


well as for scientific and wildlife purposes this vast, once-rich ecosystem should have some protected acreage. So far you have fenced about 96 acres of shinnery as a natural area and a few thousand acres of shinnery-sand dune for prairie chickens and hikers (and drill pads, pipelines, and other intrusions)--less than 1% of your lands. No shortgrass prairie is protected, though that is your principal vegetation type.

Yet FLPMA mandates protection of scientific, scenic, and ecological values (P.L. 94-579, Sec. 102(a)(8)). Bureau policy too, for instance as expressed in 1979's "Managing the Public Rangelands, commits you to serving the natural (as well as other) values. I find no sign that writers of the DEIS are aware of this law and policy, except for particular, minor instances such as endangered species (and even here they omit most, for instance black-tailed prairie dog and the plants Aster neomexicanus, Cryptantha paysonii, Eriogonum jamesii var. woottonii, Euphorbia strictior, and Tetradymia filifolia, which are known on or near Bureau lands in the RA). Ecosystems--the only real basis of natural biological values--are ignored as units for protection of natural values.

We propose that these legal requirements might be met by reservation of 10% of the Resource Area lands for natural areas, wilderness, and special habitat-management areas (such as the present prairie chicken enclosures). At least one large--20,000-acre--shortgrass area should be reserved, in suitable prairie habitat, probably northwest of Roswell. Fire (but not chemicals) should be one of the management tools in such an area, which would therefore provide valuable data for management elsewhere: especially data on plant succession and range recovery rates. We think that (given relief from livestock) fire can be used in shortgrass range; but who's to know for sure unless you try?

We urge that natural areas be incorporated into the MFP, in conformity with Bureau policy and with FLPMA's requirement that ecological values--for instance of Southern Plains Grassland--be preserved for scientific purposes.

Sincerely,  
  
 Mary S. Peterson  
 Secretary

## 6.5

Appendix E-3 displays 71 endangered, threatened, or sensitive species considered in the Draft, requests and responses to and from the USFWS, NMOW&F, and the NMSHP for lists of species to be considered. The Tularosa black tailed prairie dog (Cynomys ludovicianus), panhandle euphorbia (Euphorbia strictior), and Tetradymia filifolia were considered in the document but received "no-effect" determinations. The BLM is aware of Aster neomexicanus, Cryptantha paysonii, and Eriogonum jamesii var. woottonii as they appear in "A Handbook of Rare and Endemic Plants of New Mexico" and will consider them during any environmental assessment process.



## NEW MEXICO WILDLIFE FEDERATION

300 VAL VERDE, S.E.  
ALBUQUERQUE, NEW MEXICO 87106  
TELEPHONE (505) 265-7372  
July 5, 1984

JUL 9 10 39 AM '84

BLM Roswell Resource Area  
P.O. Drawer 1857  
Roswell, New Mexico 88201

Attention: Earl Cunningham, District Manager

Subject: Draft Mgmt. Framework Plan Amendment-Roswell Resource Area

Dear Mr. Cunningham:

The New Mexico Wildlife Federation has reviewed the draft and recommends the Decreased Livestock Grazing Alternative (DLG). We add this proviso: that grazing be eliminated altogether from riparian areas. Access for stock watering would be provided, but would be strictly limited.

From the information presented it is plain that BLM lands grazing contributes only in a minor way to the economics of the Roswell resource area. The decreased livestock grazing alternative offers the best balance in upgrading lands and supporting more wildlife, with least impact on the livestock industry. We absolutely cannot support the maximum forage production alternative (MAX).

We submit further comments on the six alternatives:

- 1) Recreation plans and budgets are practically nonexistent in all six plans. Page 2-23 lists only one developed recreation area in the entire 1 1/2 million acres, yet recreation and hunting generates some 800 thousand dollars annual income in the RRA.
- 2) Funding for wildlife is extremely low in all six alternatives.
- 3) We fail to see how eradication of sand shinnery oak can possibly benefit wildlife. We could support a program of reduced shinnery growth if it resulted in increased vegetative diversity.
- 4) The \$800,000 figure for recreational revenue seems low. You have accounted for big game hunting as well as quail and duck hunting, but camping, hiking, picnicking, birdwatching, swimming, boating, fishing, trapping, coyote calling, etc. would inflate this figure.

As discussed on page 2-12 of the Draft, existing data shows riparian habitat to be in fair to good ecological condition. A more intensive inventory and evaluation of riparian systems is in progress. Three areas have been excluded from livestock grazing. Other areas will be assessed for protection as described under the SOP on page 6.

### 7.1

It is not the intention of the BLM to eradicate shinnery oak, but to reduce it to 20 to 30 percent of vegetative composition. The effects on wildlife from shinnery oak control are discussed on pages 3-20, 3-21, 3-22, and 3-23 of the Draft.

### 7.2



-2-

In conclusion I would like to say that we are disappointed with the BLM plans for wildlife habitat improvement. After all, the BLM across the West spends more than twice as much on range management as it takes in from grazing fees. We are reminded by your report that "range improvement benefits wildlife". Is it not equally true that managing for wildlife would benefit grazing? In view of the economic figures presented some parts of the area might show a much larger cash return if managed to favor wildlife.

Sincerely,

*Leo V. Quitberg*  
Leo Quitberg  
President

LQ:bc





United States Department of the Interior

NATIONAL PARK SERVICE  
SOUTHWEST REGION

P.O. Box 728  
Santa Fe, New Mexico 87501

IN REPLY REFER TO:

L7619 (SNR-PE)

JUL 12 1984

Memorandum

To: District Manager, Bureau of Land Management, Roswell Resource Area,  
Roswell, New Mexico

From: Associate Regional Director, Planning and Cultural Resources,  
Southwest Region

Subject: Review of Draft Management Framework Plan Amendment/Environmental  
Impact Statement for the Roswell Resource Area, New Mexico (DES 84/22)

We have reviewed the subject document and find that it adequately addresses  
the concerns of this agency.

*Edmond Reyes*



NEW MEXICO DEPARTMENT OF AGRICULTURE

OFFICE OF THE DIRECTOR  
Box 3189/LC, Corrales, New Mexico 88103  
Telephone (505) 646-3007



July 13, 1984

03.18 RUN

Ms. Linda S. C. Rundell  
EIS Team Leader  
Bureau of Land Management  
Roswell Resource Area  
P.O. Drawer 1857  
Roswell, New Mexico 88201

Dear Ms. Rundell:

This letter is to serve as official comment on the Roswell Resource Area (RRA) Draft Management Framework Plan Amendment Environmental Impact Statement (DEIS). We believe the Bureau is to be commended on certain aspects. Most of the document with which we are primarily concerned is concise, well written and easily read.

The Bureau's inclusion and analysis of the livestock industry initiated alternative (the IPA) is also worthy of note. We believe that with some exceptions, the Bureau's analysis of this alternative was concise, fair and objective. This is the first grazing DEIS we have reviewed that has included an alternative prepared and submitted by livestock interests. We also found it interesting to note that the District Preferred Alternative (DPA) developed by the BLM is remarkably similar to the Industry Preferred Alternative. The major differences being the development of cooperative management plans under the DPA and an assumption used by the BLM for analyses of the IPA.

We believe the assumption used by the Bureau to analyze the IPA's effect on the vegetation resources is flawed. On page 3-30 it is stated, "Without the benefit of proper grazing management, improvement would be slight," and on page 3-2, "Vegetation trends would remain relatively unchanged on areas where no grazing programs would be implemented." This assumes that management conducted by the permittees would be inferior to that imposed by the Bureau under the DPA.

The best evidence this assumption is invalid is provided by the categorization of the grazing allotments administered by the Roswell Resource Area (west side). Thirty percent were placed in the "M" or maintain category, thus acknowledging the current satisfactory range condition of these allotments. Over 55 percent of the allotments in the RRA have been placed in the "C" or custodial category, mainly on the basis of the amount of federal land involved rather than unsatisfactory range conditions. If these "C" category allotments are removed, of the remaining allotments, 69 percent are in the "M" category.

The initial range condition ratings indicate that less than satisfactory range conditions exist on the "I" allotments. Under the IPA, no grazing programs would be developed to correct these identified problem areas. By implementation of grazing programs on the "I" allotments, as described in the DPA, it is felt that the problems can be corrected and the area's condition brought to a satisfactory level.

9.1



Ms. Linda S. C. Rundel:  
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The majority of these "M" category allotments do not presently have BLM generated management plans to prescribe grazing use. In fact, only 12 percent of the "M" allotments have plans currently in force. Additionally, 5 of the 16 allotments currently under existing Allotment Management Plans have been placed in the "I" category where range condition may have scored less than 50 points and trend is static or declining. These "I" category allotments represent 31 percent of current AMPs. When analyzed on an acreage basis, 61 percent of the total federal acres involved are located in "M" category allotments and 51 percent of the range is rated as being in good or excellent condition. These figures are evidence that a majority of permittees have done an acceptable job of managing their own grazing use of federal land without BLM generated plans, contrary to the assumption used in the DEIS.

The following comments and questions refer to specific statements and various technical aspects contained in the DEIS.

1. Under Standard Operating Procedures, page 1-19, number 7, it is stated "(w)here domestic livestock are excluded from riparian areas alternative water sources would be provided." Who will be responsible for initiating, financing and constructing said alternate water sources?
2. The final Department of the Interior Grazing Regulations provide for the development of Cooperative Management Agreements (CMAs). A discussion of this program should have been included in the standard operating procedures section.
3. On page 1-19, number 13 states "On sprayed or grubbed areas, livestock would be excluded for a minimum of 2 consecutive growing seasons." We agree that growing season deferment following vegetative manipulations is warranted to maximize benefits due to the treatment. However, benefits due to dormant season deferment are not well documented. Would grazing deferment also be required for two dormant seasons, one dormant season, or would dormant season grazing be allowed between two growing season deferments. Additionally, we find it interesting that no deferment period has been automatically included in the case of prescribed burns. Why is this the case?
4. According to the DEIS, 4489 AUMs are reserved for wildlife. Current wildlife use amounts to 2604 AUMs leaving an excess of 1885 AUMs for "other uses." What constitutes the "other uses" to which these excess AUMs can be applied? Projected big game population increases are expected to result in an additional 338 to 448 AUMs used under the Industry Preferred (IPA) and District Preferred Alternatives (DPA), respectively, in the long term. We suggest additional big game AUMs resulting from population increases be allocated from the present 1885 AUM surplus in AUMs allocated to wildlife.

We also believe data regarding wildlife AUM allocation on an allotment basis should have been included in the DEIS. We suggest another column(s) presenting these data should be added to the tables in Appendix B.

- 9.2 The BLM recognizes that problem areas still exist within five AMP allotments. Due to budgeting and other constraints, these AMPs have not yet been fully implemented.

BLM will initiate, finance, and construct those livestock water sources that replace riparian water areas. Maintenance may be assigned to the permittee or lessee under a cooperative agreement.

The Draft MFPA/EIS does not preclude the development of CMA's. The regulations referred to are currently being challenged in the judicial process. It was deemed not prudent to emphasize the CMA program pending resolution of the challenged items.

The minimum deferment period in all instances will be two growing seasons in consecutive years. A continual 16 month deferment period may be required where determined necessary.

Prescribed burning is proposed on alkali and giant sacaton swales. The objective of this burning is to stimulate plant growth to begin one to three weeks earlier than normal, and to increase use of these swales for 6 months to one year or longer following burning by reducing the amount of coarse, unpalatable growth. Therefore, a deferment period would be counterproductive to these objectives.

"Other uses" would include watershed, soil stabilization, and aesthetics.

Current BLM policy is not to allocate AUMs per se. Rather, the policy emphasizes identification and resolutions of specific conflicts, such as those which may occur between wildlife and domestic livestock.



Ms. Linda S. C. Rundell  
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5. In our opinion, the socioeconomic analysis presented in the Affected Environment section understates the economic importance of the livestock industry to the local economy.

The income and employment figures presented in Table 2-9, in many cases (for example, construction, prepared feeds, chemicals, rubber and plastic products, machinery, motor vehicles, professional services, real estate, etc.), are to some degree due to spending by the BLM range livestock and other livestock segments.

Page 2-29 presents a discussion of the shift of the RRA economy away from agribusiness toward energy minerals and recreation. While we do not argue this reality, we do believe energy development in the area is probably transitory in nature and will no longer be a viable portion of the local economy when resources have been fully exploited. Therefore, its long-term economic importance seems overstated whereas agribusiness can be perpetual and will remain a viable segment of the RRA economy in the long term.

We do not believe it to be realistic or fair to "plan" a reduced agribusiness economic importance in the long term based upon short term realities. There even appears to be some confusion on the part of the preparer(s) as to the relative economic contribution of the agribusiness community. As evidence, note the inconsistency of the following statements excerpted from the DEIS. On page 2-27 it is stated "the livestock industry, BLM livestock industry, plus the other livestock industry comprises a very small part of the total economy." Whereas, page 3-46 states "eliminating livestock grazing would produce measurable impact to the regional economy."

The DEIS refers to the Segram computer program in discussing the socioeconomic analyses of dollar values for recreation purposes. While end results are presented (e.g., total value of deer hunting) no incremental values such as the dollar value of a hunter-day are included. This prevents the reviewer from commenting on the adequacy of the values used and from checking the accuracy of reported figures.

6. The DEIS states on page 3-9, "the impacts of shinnery control in east Chaves County using tebuthiuron will be analyzed under this alternative (DPA) only." This statement has caused us some confusion. Are we correct in assuming that for analyses purposes the proposed shinnery control would only be presented under this alternative and that impacts analyzed will be smaller under other alternatives? If this is not the case, we must assume that no shinnery oak control with tebuthiuron would occur in the east Chaves area if the DPA is not selected as the preferred alternative in the record of decision. Since no justification is given for the above quotation, its actual intent is open to interpretation, such as, in order for the control projects to be initiated, east Chaves allottees had better support the DPA or lose the proposed shinnery control projects.

9.3 SAGERAM values were not used in assessing income and revenue generated by recreational use. This assessment was based on actual expenses. Values in SAGERAM are based on the willingness-to-pay concept. Reference to SAGERAM in the recreation section and Appendix G has been deleted. Incremental values of recreation are presented in Appendix G.

9.9 See page 1-10 of the Draft; paragraph 4. "... it (shinnery oak control) has been included for analysis in the DPA, although it could be included in the Final Plan under any alternative."



Ms. Linda S. C. Rundell  
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7. As we believe you are aware, the chemical 2,45-T proposed for treating mesquite is no longer registered with the U.S. Environmental Protection Agency or the New Mexico Department of Agriculture. All reference to the use of this chemical for proposed brush control projects should be removed in the Final EIS.

Our final comment applies to the labeling of the No Action alternative as the "Proposed Action." This has caused confusion on the part of some reviewers of the document. There are three primary reasons for this confusion:

1. During the scoping process one of the alternatives proposed was the No Action alternative. The DEIS has changed the name of this alternative to the Proposed Action.
2. Changing the name of the No Action alternative per se is not the problem but rather the choice of calling it the Proposed Action which implies that it is the Preferred alternative or the planned course of action. The Bureau obviously perceived the confusion this would cause by including the statement on page 1-9, "the PA is not the preferred alternative." We believe that such a statement would not have been required if the unfortunate choice of calling this alternative the Proposed Action had not been made.

3. Confusion also surrounds the actual intent of any No Action alternative. It implies the BLM would do nothing. Actually, (as we understand it) No Action as used in this context implies the status quo of Bureau activities would remain in place. We believe a brief, concise explanation of what the term No Action actually implies should be included in future documents.

We appreciate this opportunity to review and comment on the DEIS.

Sincerely,

*W.P. Stephens*

William P. Stephens  
Director

WPS/te

9.10 As stated in the Standard Operating Procedures (no. 12, page 1-19 of the DEIS) the BLM would not use any herbicide not authorized for use (labeled) by the USEPA, NMDA, DOI, and registered by the USEPA and NMDA.

9.11 The Proposed Action (PA) alternative was labeled in compliance with Washington Office Instruction Memorandum 82-650, dated September 3, 1982, which directed that (for all grazing EIS's) initiated during and after FY 1983 the proposed action shall be the continuation of the present management situation based on the permittee's or lessee's active preference, previous year's licensed use, or average actual use.



COMMENTS AND RECOMMENDATIONS  
OF  
BUD EPPERS  
IN BEHALF OF  
SOUTHEASTERN NEW MEXICO GRAZING ASSOCIATION  
NEW MEXICO CATTLEGROWERS ASSOCIATION  
NEW MEXICO WOOLGROWERS ASSOCIATION  
NEW MEXICO PUBLIC LANDS COUNCIL  
ROSWELL DISTRICT GRAZING ADVISORY BOARD  
ON THE  
WEST ROSWELL MANAGEMENT FRAMEWORK PLAN  
AMENDMENT AND ENVIRONMENTAL IMPACT STATEMENT

JUL 19 1984



We commend the Bureau for compiling this document in a way that it is easier to read and understand than any to date. We feel there are some distinct elements that need correcting and we offer our recommendations so future decision makers have factual information to use.

The Summary portion is extremely weak in that it does not include the numerous range improvements that presently exist on the Federal public lands. Since before the Taylor Grazing Act became law livestock producers in this area began development of boundary fences and the establishment of permanent water facilities. The intermingled land patterns and ready availability of Section 4 permits are the major reasons the Federal lands are so highly improved today. These improvements are readily available in the permittees files. The Bureau should apply present day values so the public has full knowledge of the sacrifice and contribution of the generations of ranchers who are responsible for the improvement of the Federal land.

Citing the basically long term stocking rates, exceptional watershed quality conditions and the abundance of game animals and wide variety of wildlife identified in occupancy with the several classes of livestock is a direct result of the numerous permanent water facilities on the existing allotments and the expert management by the permittees'.

Omission of these important facts reduces the value and quality of this EIS. We request the inclusion of this information in the final document.

The Proposed Action alternative is basically the No Action alternative; it should be changed so for any confusion that may exist is clarified. If for no other reason a No Action alternative would be consistent with previously prepared statements.

We are some what suprised in the insignificant difference between the District and Industry alternatives. The only basic difference is the development of CMP's in the DPA. In recognition of and compliance with Interior Department policy it is

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An addition to the summary (page 1) has been made to acknowledge the numerous contributions of the rancher to the public lands. The BLM recognizes that the Roswell Resource Area is one of the more highly developed areas in the state with many improvements having been constructed by the livestock operator.

The Proposed Action (PA) alternative was labeled in compliance with Washington Office Instruction Memorandum 82-650, dated September 3, 1982, which directed that (for all grazing EIS's) initiated during and after FY 1983 the proposed action shall be the continuation of the present management situation based on the permittee's or lessee's active preference, previous year's licensed use, or average actual use.

The authority and need for CMPs is stressed in the Federal Land Policy and Management Act and the Final Grazing Management Policy for achieving multiple use objectives. It is also one of the proposed actions listed in the policy under the categorization process.



bewildering that Bureau personnel continue to attempt to impose their ineffective, inefficient management of livestock grazing. Recognizing the illustrations of previous EIS's the majority of AMP or CMP allotments were in less than satisfactory condition, in fact much less than those of the permittee's who had operated with out the intervention of BLM.

Costs of developing an AMP-CMP some 5 years ago was about \$40,000 each. Using this figure (probably more costly today do to inflation, etc) taxpayer costs would exceed \$1.5 Million under the D.P.A. today. After 15-20 years of AMP intensive management, are those allotments producing above their capabilities when they were begun. Most are still awaiting the much needed, often promised, range improvement funding.

We oppose the AMP-CMP program as a whole because based on its past record it has only accomplished enlarging an over size bureaucracy requiring more salary incomes at the expense of the taxpayers with few visible or productive results.

Therefore, we request BLM delete the District Preferred Alternative from the final document and adopt the Industry Alternatives as the Proposed Action Alternative.

The Industry Preferred Alternative is purely the only logical alternative listed. Those knowledgeable of this area and the true reasons the range resource is in the satisfactory condition it is today fully support this alternative. As stated previously the improvements existing today are there because of the intermingled land patterns and unrestricted issuance of Section 4 permits. These permits, if liberally applied would result in more rapid installation of the 15.5 miles of 4 strand barbed wire, 17.5 miles of net wire fences, 38 new water developments and 32.5 miles of pipelines. The immediate improvement to the Federal rangelands would be recognized and the taxpayers would not have to raise additional funds. Existing personnel could issue the permits, therefore no increases in personnel would be required. Our only caution is that if our alternative is adopted as the Proposed Action then Section 4 permits should be provided as they were at their origin without present day restrictions.

We urge the BLM to delete the much disputed and discredited antelope numbers as requested in our statement at the official hearing on June 15, 1984. Virtually nothing can be accomplished by their inclusion and it discredits the quality of the document.

NOTE

10.4 Of the 16 AMPs, 5 are in the "I" Category, 10 are in the "M" Category and 1 is in the "C" category. The 5 AMPs in the "I" Category have not been fully implemented at this time.

10.5 As stated on page 2-16 of the DEIS, approximately 4,358 antelope inhabit the Roswell Resource Area. Of this number, it is estimated that the federal land supports approximately 385 head, exclusive of the Pronghorn Habitat Study Area. NMDG&F data indicated the projected harvest for the major portion of southeastern New Mexico in 1976 was 640 head. Actual harvest in 1976 in NMDG&F's southeast area was 847 head (personal communication with NMDG&F, Roswell 16 July, 1984).



The socio economic analysis in the Draft statement is probably the weakest element of all. First, it is totally inaccurate to use gross values for a hunter day on Federal lands and relate to net returns of livestock operations. The comparable of apples and oranges will certainly bring about unacceptable and hotly contested decision's from future authorized officers.

We concur unanimously with concerns of Dr. John Fowler in his statement made on June 15, 1984. The inaccurate, inconsistent, compilation of inputs and outputs is extremely concerning. Dr. Fowler is a recognized expert on ranch budgets and economic ranch I-O models. His input is vital to have an accurate analysis of the socio-economic impacts on the individual ranchers and local communities.

Page I-1 portrays our increasing concern over the apparent attempt by BLM to minimize the value of livestock grazing on Federal range lands. 1982 was probably the worst year, economically, for the ranching industry in Southeastern New Mexico.

The use of unsubstantiated estimates, based on manipulation of I-O figures, to form broad assumptions which will have a severe and critical affect on the livestock industry is of major concern. Bureau personnel can not support such erroneous errors. Therefore, we request the economic sector be redone entirely and further request a cooperative, coordinated effort be established with Dr. Fowler who can provide long term data on economics of ranching operations in this area and the State.

More specifically we feel certain statements or assumptions should be deleted or revised before printing the Final Document. They are on: Page 2-26 "Socioeconomic Conditions" the statement that "Recently, increased demands for access to and use of the public resources have been perceived by some as a threat to the traditional ranching lifestyle" is an erroneous, false, biased statement that should be retracted.

The facts are that unrestricted, uncontrolled access to public lands by some who show no respect or consideration for others is the true concern of the ranchers. In the past few years there has been a tremendous increase in gates left open, fences destroyed, livestock crippling and killing, target practicing on windmills and stock tanks, breaking, entering and stealing from dwellings, confrontations and killing of ranchers, etc, etc, etc.

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The tables on revenues and income from recreation are not to be compared with any of the tables of income for livestock operations. It was not the intent to compare net income from ranch operations to wildlife/recreational values. A statement has been added to the Errata section for each of the respective ranch income tables in Chapter 3 of the DEIS.

The year 1982 was used to represent the typical receipt and cost patterns of the BLM livestock industry for two reasons: (a) New Mexico State University had just constructed ranch budgets, dealing with production for the 1982 production year for the southeastern portion of the State. After consultation with Dr. James Gray, NMSU Department of Agricultural Economics, it was determined that the NMSU ranch budgets were representative of the typical receipts and costs patterns of livestock operations on public lands and could be adjusted proportionally to the various ranch size categories used in this analysis; (b) The non-availability of ranch budgets for the previous three years, 1979-81, prevented the use of a five-year average for product prices and input costs.

The economic sector used in the analysis was based on gross rancher income in the seven county region. The ranch budgets used in the analysis which were the basis for the I/O input data were coordinated with Dr. James Gray of NMSU. The problems with the economic section have been corrected, based on information and conversation with Dr. John Fowler of NMSU. It is felt that the economic section is adequate as corrected.

Reference to this item will be deleted from the DEIS.



It is becoming impossible to manage, protect or control the destruction of private property and improvements. It is becoming impossible to manage livestock production programs in a profitable manner in the intermingled land ranches. It is becoming more impractical to derive a living or live on the Federal lands that we pay a lease fee to graze.

These are just some of the increasing problems associated with free and open access. Ranchers do not object to the multiple uses of the Federal lands but when those uses, by some law breaking, irresponsible people create destruction of private lands and improvements then most assuredly they threaten continued existence.

We request you delete the language and insert what is true documented facts of life and problems associated with access.

Page 3-29 "Impacts of IPA on vegetation. The Sentence "Without the benefit of proper grazing management, improvement would be slight" should be deleted. After 50 years of primarily private range and livestock management the range lands have improved to their present condition. The Government certainly has no long term record of such effective, cost efficient management.

Page 3-43 "Impacts of ELG on Wildlife." The assumption that long term deer and antelope population would increase are highly questionable. In wilderness areas where predator control has been eliminated, game animal populations have been on a dramatic decrease for quite some time. The control methods used by livestock producers, basically sheepmen, are one of the main reasons why stable, viable game herds are prevalent. Further, the maintenance of permanent waters by permittees provides year round occupancy of rangelands which otherwise would support very few game animals. This is evidenced by the fact that over the past 25 years mule deer especially, are inhabiting a very large area they had never before occupied.

It is a fact, game animals especially would decrease without livestock grazing, so BLM's assumption should be deleted.

Page 3-63 Impacts of DLG on Socioeconomic Conditions. The assumption based on impractical estimates that 1 small cow-calf and 8 medium sheep/cow-calf operations would become non-self sufficient may be a large error. Irregardless, any livestock operation receiving a 10% or larger

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The initial range condition ratings indicate that less than satisfactory range conditions exist on the "I" allotments. Under the IPA, no grazing programs would be developed to correct these identified problem areas. By implementation of grazing programs on the "I" allotments, as described in the DPA, it is felt that the problem areas can be corrected and brought to a satisfactory level.

## 10.10

Mule deer numbers have increased in the past due to alteration of grazing and fire regimes existing before livestock grazing. The resulting increase in browse/cover species, along with increased water availability, increased the range and numbers of mule deer. While deer would likely decrease if succession shifted vegetation types toward grassland over a very long period, decreased competition for forage and cover would increase deer numbers in the ELG long-term period of 25 years. Antelope, where they exist, would increase due to reduced competition for forage. Predation will not be a significant factor on healthy big game herds in areas where habitat is unrestricted by fencing as is indicated on page 3-43 of the Draft.

## 10.11



Page 5

reduction would probably become non-self-sufficient.

Page E-4 Roswell Antelope Study. Refer to our previous statement at the June 15, hearing.

Page I-1. Structure of the Economy. Refer to earlier comments of ours and statement of Dr. John Fowler on June 15.

Page GL-1 The definition of Cooperative Agreement should also include "Permittee and U. S. Government hold proportionate interest of the improvement."

Page GL-8 The definition of Section 4 permits should include "Permittee retains full title to the improvements."

In summary we do commend the Bureau personnel for their efforts to produce a high quality document. It is superior to many we have reviewed. Our major concerns, as I hope our comments reflect, are in generally three areas: (1) The existing situation has not been adequately explained so the many contributions and sacrifices the ranchers have made over several generations are visible to the viewers of this document. Also, the range conditions today reflect their expert grazing management abilities, along with the placement of improvements in a cost-efficient and effective way. (2) The economic analysis is not appropriate to measure the socioeconomic effect that future decisions may have on the livestock industry or local communities. (3) The biased statements and assumptions are irrelevant to the existing conditions or future objectives of continuation to the improvement of the resource for livestock, wildlife, watershed, etc.

We request you consider these comments and recommendations in a constructive manner with the resource uppermost in all of our minds. We feel there is sufficient documented evidence to amply prove the capability of those dedicated individuals who for several generations have devoted their lives and resources to the improvements of the range lands, but we remain open and willing to discussing our comments and recommendations with the preparers of the Final EIS document so it will truly be the quality product we all desire.

**10.12** This item has been added to the Glossary. See page 66 of the FEIS.

**10.13** This item has been added to the Glossary. See page 67 of the FEIS.





UNITED STATES  
DEPARTMENT OF THE INTERIOR  
FISH AND WILDLIFE SERVICE

Field Supervisor  
Ecological Services, USFWS  
Post Office Box 4487  
Albuquerque, New Mexico 87196

July 20, 1984

Memorandum

To: Area Manager, Bureau of Land Management,  
Roswell Resource Area, Roswell, New Mexico

From: Field Supervisor, FWS, Ecological Services,  
Albuquerque, New Mexico

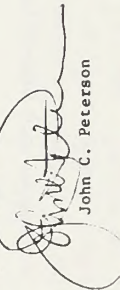
Subject: Review of Draft Management Framework Plan  
Amendment/Environmental Impact Statement  
for the Roswell Resource Area (BLM) EC 84/16

The U.S. Fish and Wildlife Service has reviewed the subject document and offers the following comments:

We support the BLM management objectives to improve ecological range conditions, to enhance wildlife habitat, to protect and conserve wetlands, riparian resources and threatened and endangered species, and to stabilize watersheds. These objectives can best be achieved by implementing the District Preferred Alternative (DPA), the Elimination of Livestock Grazing Alternative (ELG), or the Decreased Livestock Grazing Alternative (DLG). The Industry Preferred Alternative (IPA) and the Maximization of Forage of Livestock (MAX) are least likely to achieve these objectives. The Proposed Action (PA) or "No Action" alternative is less desirable than the DPA, ELG or DLG, but more desirable than the IPA or MAX alternatives.

The "No Action" alternative is the baseline to which the other alternatives can be compared. However, its designation as the Proposed Alternative implies that a preliminary decision has already been made with regard to the selection process. We believe this designation is both misleading to the reviewer and premature considering that one of the other alternatives, or a combination of several alternatives, may be selected for implementation. We suggest that you designate the PA as the No Action (NA) alternative to avoid any possible ambiguity.

We appreciate this opportunity to comment.

  
John C. Peterson

cc: Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico  
Chief, FWS, EC, Washington, D.C.  
Regional Director, FWS, Habitat Resources, Albuquerque, New Mexico

JUL 23 1984

The Proposed Action (PA) alternative was labeled in compliance with Washington Office Instruction Memorandum 82-650, dated September 3, 1982, which directed that (for all grazing EIS's) initiated during and after FY 1983 the proposed action shall be the continuation of the present management situation based on the permittee's or lessee's active preference, previous year's licensed use, or average actual use.



# Wildlife, Range, and Water Management, Inc.

Ronnie DeMasters  
President  
Michael Bandenckuk  
Biologist

P.O. Box 472  
Chama, New Mexico 87520  
(505) 756-2942

JUL 23 1984

BLM, Roswell Resource Area

P.O. Drawer 1857

Roswell N.M. 88201

Attn: Linda S. C. Rundell

Dear Ms. Rundell

This letter is to serve as comment on the Draft MFP Amendment EIS on Rangeland Management in the Roswell Resource Area. I realize that these comments will probably be reviewed late, but hope that they may be incorporated into the revisions for the final EIS.

Specific comments on errors or apparent errors will not be made. I'm sure that these have been brought to your attention through various other sources, such as the NMSU Range Improvement Task Force and N.M. Dept. of Agriculture. I would like to compliment your efforts as this has been one of the "error free" documents of its type which I have reviewed. I will attempt to comment only on areas of major concern.



# Wildlife, Range, and Water Management, Inc.

Bonnie Dalkowski  
President  
Michael Bordenchuk  
Biologist

JUL 2 8 1984  
P.O. Box 472  
Chama, New Mexico 87520  
(505) 756-2942

There appears to be very little difference between the DPA and the IPA, but these differences can be very important. Having played a role in the development of the IPA I feel obligated to comment on it.

I cannot find anywhere any statistics which would justify a lowered long run increase in the livestock numbers under the IPA than under the DPA. I believe that this is a Bureau injected bias to maintain a bureaucracy where it is not needed.

During the development of the IPA the Department of Interior had not adopted the Cooperative Management Agreement (CMA) policy. Essentially, our alternative has fallen along the lines of this policy. I am extremely disappointed that this was left out of the EIS either as part of the IPA (since it is so closely related) or in the DPA (since it is standard operating procedure). The inclusion of this policy, and its analysis, would have lent a greater credibility to the document. As it stands the document tells only a portion of the story.

I believe that there was no reason to evaluate a DLG alternative other than to placate anti-grazers. We have long understood the inclusion of the ELG and MAX alternatives and they seem to balance each other out. However, the DLG

The IPA and DPA are similar in content, differing mainly in funding of range improvements and the development of grazing programs, etc. The initial range condition ratings indicate that less than satisfactory range conditions exist on the "1" allotments. Under the IPA, no grazing programs would be developed to correct these identified problem areas. By implementation of grazing programs on the "1" allotments, as described in the DPA, it is felt that the problems can be corrected and the area's condition brought to a satisfactory level.

## 12.1

The Draft WPA/EIS does not preclude the development of CMA's. The regulations referred to are currently being challenged in the judicial process. It was deemed not prudent to emphasize the CMA program pending resolution of the challenged items. CMAs are not standard operating procedure.

## 12.2



## Wildlife, Range, and Water Management, Inc.

Ronnie Ockelmann  
President  
Michael Bodenkorn  
Biologist

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Chama, New Mexico 87520  
(505) 766-2842

alternative is nothing more than the expression of a feeling which should not be present within the Bureau.

In all the document was well prepared. I believe we should have had greater access to the rationale between the end results of the DPA and IPA analysis. I further believe that these two alternatives are closer in their impact than the Bureau would lead us to believe, and feel that the IPA is better keeping with present policy (ie CMAA) and is more cost-efficient.

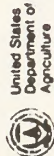
My recommendation is that the IPA be implemented through the Record of Decision

Sincerely,

Michael J. Bodenkorn

Biologist





United States  
Department of  
Agriculture

Soil  
Conservation  
Service

517 Gold Avenue SW, Room 3301  
Albuquerque, NM  
87102

July 19, 1984

Mr. Phil Kirk  
Bureau of Land Management  
Roswell Resource Area  
P.O. Drawer 1857  
Roswell, NM 88201

Dear Mr. Kirk:

We have reviewed the Draft MFPA/EIS for the Roswell Resource Area.

Our comments are:

Page 2-10, Water, third paragraph, second sentence should be changed to read - The method is based, in part, on soil infiltration rates, etc.

Page 2-13, Desert Mule Deer. We suggest that additional details be furnished to indicate that browse types in the Corona, Ancho, White Oaks areas are being damaged by overutilization of large deer populations.

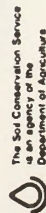
Pronghorn - exclusive of the study area. These rangeland habitats have suffered from drought, with loss of grass production and concurrent increase in forb species. We do not agree that these rangelands are in "stable condition" as far as antelope habitat. The habitats are now good antelope habitat, but will decline in food quality. As ecological condition improves, wouldn't its value as antelope habitat decline?

We disagree with some of the statements made for the proposed action, beginning on page 3-3. There are connotations repeatedly made that no major changes in management will occur. The land area, according to our information, is 83.6 percent private and State of New Mexico lands. Ranching operators have been, and we feel, will continue to make improvements to grazing management. We feel that without BLM involvement, there will continue to be improvements to the resources.

Page 3-12, Chemical Brush Control. First paragraph. We question the fourth sentence - beginning - "Density of brush species may increase-etc". The statement appears contradictory to the rest of the paragraph. We suggest clarification is needed.

Page 3-13. We understand that the label for 2, 4, 5-T has been withdrawn and that its' use is no longer approved for use on rangeland.

Page 3-15, Range Improvements. We suggest that statements about the value of 38 additional livestock waterings in reducing overutilized ranges should be restated. Our review of the MFPA/DEIS indicates that the planning area is 2323.3 square miles. Adding 38 waterings, or one for every 61.1 sections will have little effect on livestock distribution. The needs of the land could more realistically be met by adding one watering for each section of productive rangeland.



The Soil Conservation Service  
is an agency of the  
Department of Agriculture

**13.1** The sentence has been corrected as recommended. See page 64 of the FEIS.

**13.2** The vast majority of the areas referred to are held by private interests and the US Forest Service.

**13.3** According to the data supplied by the NMDGAF, these rangelands are currently in stable condition for antelope. Depending on an area's range site, along with management practices, improved ecological condition may or may not be beneficial to antelope.

**13.4** The assumption used that no major changes in management would occur was developed in order to provide a constant for baseline analysis.

**13.5** Depending on range site and management practices, grass production would remain higher than levels prior to treatment for 7 to 30 years. Depending again on those two factors, the density of brush may begin to increase several years after treatment, thereby making some form of maintenance treatment necessary within 10 to 20 years.

**13.6** As stated in the Standard Operating Procedures (no. 12, page 1-19 of the DEIS) the BLM would not use any herbicide not authorized for use (labeled) by the USEPA, NMDA, DOI, and registered by the USEPA and NMDA.

**13.7** This area contains approximately 3,000 water sources. The additional 38 water sources would be developed to correct identified problems on "1" category allotments.



Phil Kirk

2

Page 3-17, Soils/Watershed. The first paragraph infers that rates of wind and water erosion will increase after brush control with herbicides, and will remain high for a long term. We suggest that research published by Dr. Walter Gould at NMSU, and others, has shown that the response of ground cover is rapid if the proper sites have been selected for treatment. Within 2 to 3 years, with normal rates of precipitation, the rates of wind and water erosion should be decreased.

Our review was made at the Roswell Area Office. We suggest that any questions be directed to Dick Smith or Pat Shaver.

I appreciate the opportunity to review this management framework plan.

Sincerely,

*Ray T. Margo, Jr.*  
Ray T. Margo, Jr. for  
State Conservatigist

cc:  
Richard Smith, AC, Roswell A0

On page 3-17 of the DEIS, it is stated "Chemical treatments would have a short-term negative impact on soil erodibility". The short term, as defined on page 3-1 of the DEIS, refers to impacts which would occur within five years.

13.8





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VI  
INTERFIRST TWO BUILDING, 1201 ELM STREET  
DALLAS, TEXAS 75270

JUL 18 1964

JUL 21 1964

Mr. Phillip Kirk  
Area Manager  
Bureau of Land Management  
Roswell Resource Area  
P.O. Drawer 1857  
Roswell, New Mexico 88201

Dear Mr. Kirk:

We have completed our review of your Draft Management Framework Plan Amendment/Environmental Impact Statement (EIS) on a proposed rangeland management program for approximately 1.5 million acres of public land in the Roswell Resource Area located in Lincoln, Chaves, Quay and four other counties in southeastern New Mexico.

The management program involves the amount of vegetation available for grazing and other uses; the methods of monitoring and evaluation, and rangeland improvements. The Draft EIS evaluated the alternative programs that included increasing forage for livestock, decreasing livestock grazing and eliminating grazing. The preferred alternative contains a combination of elements that conforms to the BLM Grazing Management Policy and responds to social and economic concerns.

We classify your Draft EIS as LO-1. Specifically, we have no objections to the project as it relates to EPA's legislative mandates. The EIS contained sufficient information to evaluate adequately the possible environmental impacts which would result from project implementation. Our classification will be published in the Federal Register in accordance with Section 309 of the Clean Air Act.

Definitions of the categories are provided on the enclosure. Our procedure is to categorize the EIS on both the environmental consequences of the proposed action and on the adequacy of the EIS at the draft stage, whenever possible.

-2-

We appreciated the opportunity to review the Draft EIS. Please send our office five (5) copies of the Final EIS at the same time it is sent to the Office of Federal Activities, U.S. Environmental Protection Agency, Washington, D.C.

Sincerely yours,

*Jack Whittington*  
Jack Whittington, P.E.  
Regional Administrator

Enclosure



# **PUBLIC HEARING**







STATEMENT CONCERNING MANAGEMENT FRAMEWORK PLAN AMENDMENT/  
ENVIRONMENTAL IMPACT STATEMENT: Draft

By John M. Fowler  
Associate Professor  
Agricultural Economics  
New Mexico State University  
Range Improvement Task Force

Examination of the Roswell Resource Area Environmental Impact Statement (EIS) has yielded a mixture of concerns. These concerns should be properly addressed before decisions are made that directly impact upon the livestock industry and surrounding community infrastructure. The comments will address specifically the socio-economic portion of the EIS.

#### LIVESTOCK INDUSTRY INCOME

Under the general heading of the livestock industry income it is readily apparent that more detail is needed in order to evaluate the "soundness" of the information. The relative importance of the livestock sector in the I-O model used in the EIS is a direct function of both the receipts and costs of the budgeted ranches.

The first major concern is the selection of the year 1982 to represent the typical receipts and cost pattern of the livestock

The year 1982 was used to represent the typical receipt and cost patterns of the BLM livestock industry for two reasons: (a) New Mexico State University had just constructed ranch budgets, dealing with production for the 1982 production year for the southeastern portion of the State. After consultation with Dr. James Gray, NMSU Department of Agricultural Economics, it was determined that the NMSU ranch budgets were representative of the typical receipts and costs patterns of livestock operations on public lands and could be adjusted proportionally to the various ranch size categories used in this analysis; (b) The non-availability of ranch budgets for the previous three years, 1979-81, prevented the use of a five-year average for product prices and input costs.



industry. Five year actual use figures were used to determine the animal units (AU's) actually run on the allotments and longterm monitoring was used to determine forage and trend; why then only one year for product prices and input costs. Ranch budget work is expensive and arduous but is vitally necessary for the accurate determination of net income that is eventually plugged into the I-O model framework.

Appendix A: Enclosed for New Mexico is a list of rancher net incomes from 1940 - 1982; over the last 25 years negative ranch income were calculated in 5 of 25 years or only 20% of the time. It is therefore reasonable to question the negative net incomes for small cow calf operations and medium sheep operations as stated on page 2-29. In further examining negative income of the small commercial cow/calf operation and medium commercial sheep/cow-calf operations as presented in table 2-12, it is apparent that a mistake has been made. The return above cash costs is reported as 447 thousand, depreciation is listed as nearly 242 thousand leaving a positive return of 205,314 for the medium commercial sheep/cow-calf rather than a negative figure. A further inconsistency between text and table 2-12 is made on page 2-30. Here, the 1982 BLM range livestock industry is stated as making a net return to operator labor, management, and capital of a minus 1.5 million. Whereas the value reported in table 2-12 is a positive 1.5 million. Which of the figures was included in the I-O model of sector interaction; if it was the negative figure then it is small wonder that the BLM livestock industry had no significant impact when reduction of livestock numbers was considered.

A more detailed examination of the numbers used indicate a further discrepancy between the number of operators; the text states (2-29)

The narrative on page 2-29 has been changed to correct the error in the medium sheep/cow-calf operations. The negative values derived for the small commercial cow-calf operations were a result of the computations of the I/O model using the ranch budget information coordinated with Dr. James Gray, NMSU.

#### PH 1.2

The narrative on page 2-30 has been changed to read "When allowance is made for depreciation from total sales, returns to operator labor, management and capital is reduced to a total net income of \$1.5 million."

#### PH 1.3

The cumulative gross ranch income for each alternative was used to drive the I/O model. The net income, 1.5 million dollars, is depicted in the ranch budgets and was used to assess primary impacts on the livestock operators.

#### PH 1.4



that there are 40 cow-calf and 36 sheep/cow-calf whereas the table indicates a population of 39 cow-calf and 37 sheep/cow-calf. Where is the consistency? How many of the actual operators were included in developing the budgets in the appendix? Two figures stand out drastically in the index budgets; first is the very high depreciation values subtracted from gross income and secondly is the very heavy cost of supplements and feed. The discrepancy could be in the sample drawn or in the year selected.

The cumulative result of all the above considerations could drastically change the profitability picture of the livestock industry. The probability of negative net income is around .20 but the degree of negativity is an explicit function of the cattle prices received, operations costs incurred and unrealistic depreciation schedules. Severe doubt is cast upon the socio-economic portion of the Management Framework Plan Amendment/EIS, when these potential pitfalls (that are difficult to document) are coupled with the provided data and its' obvious discrepancies between text and tables.

#### Recreational Values

Another area of the EIS that needs further explanation is the recreational values on public land. By combining the activity and value of activity of table 2-13 with the number of visitor hours under the existing situation, an interesting result is determined. The \$373,551 recreational value for deer hunting in the western portion is derived from 52,536 hours of deer hunting in the western portion. This

**PH 1.5** The narrative on page 2-29 has been changed to read "Those allotments are used by 76 ranchers, 37 sheep/cow-calf operations and 39 cow-calf operations."

**PH 1.6** The depreciation values and the cost of supplements and feed were derived from the NMSU ranch budgets and adjusting them to the various BLM ranch size categories in consultation with Dr. James Gray, NMSU.



translates into \$7.11 per hour of deer hunting. Where is this figure supported? The Sage Ram model requires parameters of this sort to be estimated from the state or district they are not generated from the model. The magnitude of the figure would indicate that they represent gross expenditures; if this is the case then gross expenditure figures should be used for all other sectors of the economy that were included in the I-O model. Was this in fact done? If not, the inconsistent units would invalidate any inferences that were made from the incorrectly specified I-O model.

## PH 1.7

The recreational values were derived from a comprehensive report based upon a study conducted for the New Mexico Department of Game & Fish by Thomas O. Kirkpatrick from the Bureau of Business Research, University of New Mexico. The report is titled "Economics and Social Values of Hunting and Fishing in New Mexico". The recreation values used in this assessment were up-dated to 1982 using the GNP deflation factor and are based on actual expenses.

## PH 1.8

SAGERAM values were not used in assessing income and revenue generated by recreational use. This assessment is based on actual expenses. Values in SAGERAM are based on the willingness-to-pay concept. Reference to SAGERAM in the recreation section and Appendix G has been deleted. Incremental values of recreation are presented in Appendix G.



Table 4. Calculation of Net Returns to Operator Labor, Management and Total Capital New Mexico, 1940-82

Year	USDA-Southwest		Northeast		Southwest		ALL		Prelim		Final	
	220 Head	220 Head	390 Head	240 Head	New Mexico 240 Head	New Mexico 300 Head	New Mexico 300 Head	Adjusted 300 Head	New Mexico 450 Head	New Mexico 1000 Head	Final New Mexico	Final 1000 Head
1940	1,376							1,698	2,904	8,422		
41	2,590							3,196	5,465	15,852		
42	3,325							4,103	7,016	20,351		
43	2,049							2,529	4,325	12,544		
44	1,541							1,902	3,252	9,434		
45	2,334							2,880	4,925	14,285		
46	2,424							2,991	5,115	14,835		
47	4,140							5,109	8,736	25,341		
48	6,318							7,797	13,333	38,673		
49	6,636							8,189	14,003	40,617		
1950	9,181	8,397						11,332	19,378	56,207		
51	9,233	8,293						11,191	19,137	55,507		
52	1,134	38						51	87	253		
53	-490	-1,927						-2,600	-2,300	200		
54	323	-1,281						-1,729	-1,429	1,071		
55	1,399							1,888	3,228	9,364		
56	-3,078							-4,289	-3,989	-1,489		
57	2,771							3,739	6,394	18,545		
58	7,524							10,154	17,363	50,364		
59	6,559							8,851	15,135	43,901		
60	7,112							9,598	16,413	47,606		
61	8,167							11,021	18,846	54,664		
62	7,789							10,511	17,974	52,135		
63	5,081							6,857	11,725	34,011		
64	1,310	-1,133						1,768	3,023	8,769		
65	6,146	8,777						8,294	14,183	41,138		
66	7,293	10,729						4,810	8,225	23,858		
67	7,216	8,764						7,945	13,586	39,407		
68	7,343	10,278						4,043	6,914	20,053		
69	10,468	12,174						11,310	19,340	56,098		
1970								11,161	19,085	55,359		
71		7,668						9,692	16,573	48,072		
72		25,602						23,007	39,342	114,115		
73								25,743	44,021	127,685		
74								-2,709	-1,509	7,091		
75								-9,096	-7,896	704		
76								-10,500	-9,300	-700		
77								-11,532	-10,332	-1,732		
78								10,801	18,470	53,573		
79								28,103	48,056	139,391		
1980								14,843	25,382	73,621		
81								2,930	5,010	14,533		
82								-4,841	-3,641	7,829		

\*Adjustment factor for negative values was \$8 per head x increased number head, less loss on smaller ranch in 1970's, and \$2 per head in 1950's.

\*Adjustment factor for positive values was 1.71, based on SW ranch net incomes per head.



STATEMENT OF BUD EPPERS  
FOR MEMBERS OF THE  
SOUTHEASTERN NEW MEXICO GRAZING ASSOCIATION  
NEW MEXICO CATTLEGROWERS  
NEW MEXICO PUBLIC LAND COUNCIL  
ROSWELL DISTRICT GRAZING ADVISORY BOARD  
ON  
WEST ROSWELL MANAGEMENT FRAMEWORK  
PLAN AMENDMENT AND ENVIRONMENTAL  
IMPACT STATEMENT  
AT  
ROSWELL INN FRIDAY JUNE 15, 1984



The Bureau of Land Management personnel are to be commended for the compilation of material presented in this Draft MFPA-EIS. Organization of alternatives and comparisons formulated in such a way that evaluation is much easier.

We are disappointed that the Bureau did not include and request that they do so in the final EIS, an elaboration of the existing situation. Livestock producers have totally financed, constructed and maintained over 95% of all existing range improvements on the Federal lands in this area.

Extensive pasture development has resulted in more effective livestock management. Calf and lamb percentages exceed those found in the majority of the western third of the nation. Although animal weights were taken during one of the most serious drouths this area has experienced in 40 years, more normal weights of calves would be in the 450-550 pound range while lambs average between 75-95 pounds.

Water development and distribution are unequalled in other regions. Livestock travel less than 2 miles and in most areas probably not more than 1 mile. Results have been extra ordinary as is seen in the tremendous improvement that has occurred around sacrifice areas of the few natural water holes. Uniform grazing patterns exist throughout most pastures which has ultimately resulted in over 80% of the ranches being placed in the "M" category.

Virtually 60% of the area evaluated fell in the Good to Excellent condition class. 30% was found to be in High Fair while only 10% was in Low Fair or Poor. Furthermore, only 1 allotment was identified as having a declining trend; 8 were stable and 114 were in an improving trend.

Thirteen or 34% of the allotments in the I category were placed there solely because additional range improvements were desired on Federal Lands.

Deer, antelope, quail, dove, pheasant and numerous other forms of wildlife and birds inhabit this area in abundance reflecting their compatibility with the various classes of livestock that graze upon the land. Mule deer have inhabited a large portion of this area only for the past 20 years. Prior to the vast development of permanent water no deer existed, neither were gray kit fox or quail prevalent.



The previous facts need to be included in the F. E. I. S. for any interested party to review. They are true facts, not assumptions and the record of achievement should be placed where it belongs; on the ranchers who have sacrificed dearly to bring about these improvements.

As we stated earlier, over 95% of all range improvements on the Federal lands were totally constructed, paid for and maintained by the ranchers. Only the ranchers are responsible for the exceptional good condition the land is in today. Ranchers in Southeastern New Mexico should be placed on a pedestal for all to see so that others may benefit from their achievements.

We are extremely disappointed the Bureau continues to cite the falsehood of declining antelope numbers west of Roswell. The 3,000 head figure may have been true but records also exist in New Mexico Department of Game and Fish files that the Roswell District had 4,870 in 1976. Also and most important there were 640 antelope killed in the 1976 season alone on the Brown, Henderson and Corn ranches which is far above 300 head west of Roswell as stated by the Bureau.

Irregardless the recent antelope study verified rancher contentions that competition between sheep and antelope for available forage are so great that antelope could not survive during the numerous drouths that affect this area.

The New Mexico Department of Game and Fish had also rated this same area as prime antelope habitat for the Management Framework Plan. Again, the study highly indicated that a majority of these lands were unsuitable for antelope habitat.

We strongly recommend that the false figures on antelope numbers west of Roswell be deleted from the FEIS.

The Sage Ram program developed by the Bureau in Denver is going to be criticized tremendously for the valuations applied to hunter days. I believe, as sure as I'm sitting here, that within the foreseeable future comparison will be made in values of game animals and their pursuit and livestock. Using travel, food, lodging; etc. to value recreational hunting and then only a small proportion of benefits ranchers and livestock contribute for comparisons is absurd. Future decisions that pit Sage Ram wildlife values and livestock will be strongly contested. It would be another comparison of apples and oranges which the Bureau has attempted in the past

more

As stated on page 2-16 of the DEIS, approximately 4,358 antelope inhabit the Roswell Resource Area. Of this number, it is estimated that the federal land supports approximately 385 head, exclusive of the Pronghorn Habitat Study Area. NMDG&F data indicated the projected harvest for the major portion of southeastern New Mexico in 1976 was 640 head. Actual harvest in 1976 in NMDG&F's southeast area was 847 head (personal communication with NMDG&F, Roswell 16 July, 1984).

#### PH 2.1

The Roswell Pronghorn Study indicates that forage competition between antelope and sheep will limit antelope numbers. However, without this competition factor, a portion of the area would be suitable for antelope.

#### PH 2.2

SAGERAM values were not used in assessing income and revenue generated by recreational use. This assessment is based on actual expenses. Values in SAGERAM are based on the willingness-to-pay concept. Reference to SAGERAM in the recreation section and Appendix G has been deleted. Incremental values of recreation are presented in Appendix G.

#### PH 2.3



Page 3

with little success. We realize this is not a decision document but decisions will be made from it and we would recommend deletion of Sage Ram values for hunter days or inclusion of all values attributed to livestock.

This concludes my statement for this hearing on the West Roswell MFPA-EIS but I will submit more detailed comments shortly.

Again, I commend the Bureau for the improvement of the EIS over previous statements. With our recommended changes we feel decisions of the future can be made with pride by BLM personnel and accepted with less opposition by those most affected.



Statement of Thor Stephenson  
New Mexico Department of Agriculture

Good afternoon. My name is Thor Stephenson; my address is Post Office 5702, Las Cruces, New Mexico, 88003. I am a Range Management Specialist with the New Mexico Department of Agriculture and am speaking today on behalf of the Department. We appreciate this opportunity to present commentary on the Roswell Resource Area Management Framework Plan Amendment/Environmental Impact Statement in a public meeting.

We have reviewed the document and are today presenting brief comments on a few general topics. Technical commentary will be provided in written format prior to the comment period deadline of July 19, 1984. We would like to commend the Bureau and the preparers of this document on several aspects. First, we found a majority of portions of the document with which we were primarily concerned to be concise, well-written and easily read.

This is not to be construed to mean that we have no problems with the quality of the document in specific instances, however. The bulk of the DEIS is of satisfactory quality. Second, the Bureau's conclusion and analysis of an industry initiated alternative, the IPA, or Industry Preferred Alternative, is worthy of note. We also believe that with some exceptions the Bureau's analyses of this Alternative was concise, fair, and objective. This is the first grazing DEIS we have reviewed that has included an Alternative prepared and submitted by livestock interests. We also found it interesting to note



that the District Preferred Alternative, developed by the BLM, is remarkably similar to the Industry Preferred Alternative, the major differences being the development of Cooperative Management Plans under the District Preferred Alternative, and an assumption, used by the BLM for analysis of the District Preferred Alternative. We believe the assumption used by the Bureau in analyzing the Industry Preferred Alternatives' affect on the vegetation resources is flawed. On page 3-30 is stated, I quote, "without the benefit of proper grazing management, improvement would be slight", unquote. This assumes that management conducted by the permittee would be inferior to that proposed by the Bureau under the District Preferred Alternative. The best evidence that this assumption is invalid is that: of the grazing allotments administered by the Roswell Resource Area, West Side, 30 percent are placed in the "M" or Maintain category, acknowledging the current satisfactory range condition of these allotments. Over 55 percent of the allotments in the Roswell Resource Area have been placed in the "C" or Custodial category, mainly on the basis of the amount of Federal land involved, rather than unsatisfactory ranching conditions. If these "C" category allotments were removed, of the remaining allotments 69 percent are in the "M" category. The majority of the "M" category allotments do not presently have BLM generated management plans to prescribe grazing use. In fact, only 12 percent of the "M" category allotments have plans currently in force. Additionally 5 of the 16 allotments currently under existing allotment plans have been placed in the "I" category where range condition may have scored less than 50 points and trend is static with the plan. These "I" category allotments represent 31 percent of the current annual (sic) management, Allotment Management Plans.

## PH 3.1

The initial range condition ratings indicate that less than satisfactory range conditions exist on the "I" allotments. Under the IPA, no grazing programs would be developed to correct these identified problem areas. By implementation of grazing programs on the "I" allotments, as described in the DPA, it is felt that the problems can be corrected and the area's condition brought to a satisfactory level.

## PH 3.2

The BLM recognizes that problem areas still exist within five AMP allotments. Due to budgeting and other constraints, these AMPs have not yet been fully implemented.



When analyzed on an acreage basis, 61 percent of the total Federal acres involved are located in the "M" category allotments, and 51 percent of the range is rated as being in good or excellent condition. All these figures are evidence of the fact that a majority of permittees have done an acceptable job of managing their own grazing use of Federal land without BLM generated plans, contrary to the assumption used in the DEIS.

Our final comment applies to the labeling of the No Action Alternative as the proposed action. This has caused confusion on the part of some of the reviewers of the document. There are 3 major reasons for this confusion. Number one: during the scoping process one of the Alternatives proposed was the No Action Alternative; the DEIS has changed the name of the Alternative to Proposed Action. Number two: changing the name of the No Action Alternative, per se is not the problem, but rather the choice of calling it the Proposed Action, which implies it is the Preferred Alternative or the planned course of action. The Bureau obviously perceived the confusion this would cause by including the statement on page 1-9, I quote, "the proposed action is not the Preferred Alternative", unquote. We believe that such a statement would not have been required if the unfortunate choice of calling this Alternative the Proposed Action had not been made. Number three: confusion also surrounds the actual intent of any No Action Alternative. It implies the BLM would do nothing. Actually, No Action, as used in this context, implies the status quo of Bureau activities would remain in place. We believe a brief, concise explanation of what the term No Action actually implies should be included in future documents.

On behalf of the New Mexico Department of Agriculture I thank you for this opportunity to present our views on the DEIS.

The Proposed Action (PA) alternative was labeled in compliance with Washington Office Instruction Memorandum 82-650, dated September 3, 1982, which directed that (for all grazing EIS's) initiated during and after FY 1983 the proposed action shall be the continuation of the present management situation based on the permittee's or lessee's active preference, previous year's licensed use, or average actual use.



Statment (Oral) of W.J. Ball,  
Roswell, New Mexico  
Chairman of the New Mexico Association of  
Natural Resource Conservation District

At this time, I have no oral statement to make, other than to endorse the  
statement made by Mr. Bud Eppers.







# ERRATA







MODIFICATIONS AND CORRECTIONS TO THE  
DRAFT MANAGEMENT FRAMEWORK PLAN AMENDMENT/  
ENVIRONMENTAL IMPACT STATEMENT

INTRODUCTION

The modifications and corrections section contains revisions made to the Draft Management Framework Plan/Amendment/Environmental Impact Statement based on new or more complete information, changes in BLM guidance since release of the Draft, or errors and omissions identified through the public review process. Minor changes are incorporated into the Errata section below. Where significant changes have been identified, the entire page has been reprinted.

ERRATA

The following changes in the Draft MFPA/EIS are of editorial nature and are relatively minor. Consequently, the affected pages have not been reprinted in full. These changes are to be incorporated into the Draft MFPA/EIS. Pages b-13 and d-3 have been reprinted in full. Table 2-29 has been reprinted.

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Page 1-14, under Decreased Livestock Grazing, second paragraph, line 1.  
Change: Grazing would be eliminated to Grazing preference would be suspended.

Page 1-14, Table 1-4, under CURRENT LICENSED AUMs  
Change: Total from 1516 to 516.

Page 1-17, second paragraph, line 5.  
Change: mOy to may.

Page 1-19, number 13, last line.  
Add: ...or for a continual 16 month period where determined necessary.

Page 1-20, under Implementation Schedule, first paragraph, line 7.  
Change: necessary to justified.

Page 1-21, Figure 2.  
Change: Issue Decision to Issue Decisions.

Page 2-6, first full paragraph, line 4.  
Replace: are under Allotment Management Plans with have Allotment Management Plans or its equivalent.

Page 2-6, under Allotment.  
Change: Roadrunner Ranches to Alvin Connell (Hays).

Page 2-8, Table 2-4, under WEG  
Change: 4 to 4L.

Page 2-10, under Water, paragraph 3, line 3.  
Add: is based, in part, on.

Page 2-26, first paragraph.  
Delete: lines 9, 10, 11 beginning with Recently, on line 9.



Page 2-29, under Characteristics.

Change: 36 sheep/cow-calf to 37 sheep/cow-calf.

Change: 40 cow-calf operations to 39 cow-calf operations.

Paragraph 4, line 2.

Delete: and the medium sheep operations.

Page 2-30, second full paragraph, line 5.

Delete: minus.

Table 2-12, Depreciation.

Change: -72,067 to -72,607.

Page 2-31, Table 2-13.

Delete: Sage Ram.

Add: The change in recreation values is a change in expenditures by sportsmen and cannot be compared to Table 2-12.

Page 3-8, Table 3-6.

Delete: Sage Ram.

Page 3-28, Table 3-18.

Delete: Sage Ram.

Add: The change in recreation values is a change in expenditures by sportsmen and cannot be compared to Table 3-17.

Page 3-39, Table 3-29.

Delete: Sage Ram.

Add: The change in recreation values is a change in expenditures by sportsmen and cannot be compared to Table 3-28.

Page 3-45, under Socioeconomic Conditions.

Change: -21.16% to -21.6%

Page 3-46, Table 3-38.

Delete: Sage Ram.

Add: The change in recreation values is a change in expenditures by sportsmen and cannot be compared to Table 3-37.

Page 3-58, Table 3-50.

Delete: Sage Ram.

Add: The change in recreation values is a change in expenditures by sportsmen and cannot be compared to Table 3-49.

Page 3-64, Table 3-59.

Delete: Sage Ram.

Add: The change in recreation values is a change in expenditures by sportsmen and cannot be compared to Table 3-58.



Page 4-5, under District Advisory Council/Grazing Advisory Boards.  
Add: Draper, Mark; Hamill, Gene; Treat, W.C.; Ball, William J.; Corn,  
Bronson; Greenwood, Hart Jr.

### Appendices

Page b-3, (Appendix B-2) under 3011 Connell (Hays).  
Change: 5480 to 7720;  
Change: 2240 to 0.

Page b-3 (Appendix B-2) under 3011 Connell (Byrd).  
Change: 930 to 966 in both columns.

Page b-3 (Appendix B-2), under 3020 X-Bar Ranch.  
Change: 2260 to 2660.

Page b-6 (Appendix B-2), under Original Adjudicated Preference (AUMS),  
Change: total 163,675 to 164,711.  
Under 5-Year Average Licensed Use (AUMs).  
Change: total 150,206 to 150,242.

Page b-12 (Appendix B-3). Under 4071.  
Change: Jack Price Est. to Price, George.  
Under 4078.  
Change: McCam to McCan.

Page b-14 (Appendix B-4).  
Delete: entire line beginning with 5032.  
Change: total Federal Acres 136,319 to 127,840.  
Delete: 548,352 Total.

Page b-15 (Appendix B-4),  
Add: 5040 Harral, Malcolm 447 (ac.).

Page b-16 (Appendix B-4),  
Change: 5080 to 5081.  
Change: Total Public Lands Acreage from 35,460 to 35,907.

Page i-4, Table I-3, under DLG  
Change: Depreciation from 1369 to 4271.  
Change: Returns to Operator from -2,902 to -2,395.

### Glossary

Add:

COOPERATIVE AGREEMENTS. Title to structural or removable improvements shall be shared by the United States and cooperators in proportion to the actual amount of the respective contribution to the initial construction. Title to nonstructural or nonremovable improvements shall be in the United States.

LEK. An area where members of a species of the grouse family congregate to perform characteristic mating/breeding rituals.



SECTION 4 PERMITS. The permittee or lessee shall have title to removable range improvements fully constructed by private funds.

Literature Cited

Page 1c-3, third paragraph

Change: Guidebood to Guidebook.



TABLE 2-9  
ESTIMATED PERSONAL INCOME<sup>a/</sup> AND EMPLOYMENT FOR THE  
ROSWELL RESOURCE AREA, 1982

Industry Sector	Income	Employment
1. BLM Range Livestock	\$ 591,000	195
2. Other Livestock	10,320,000	1,534
3. Other Agriculture	7,343,000	1,149
4. Agriculture, Forestry, Fisheries, Service	1,698,000	276
5. Metal Mining	533,100	44
6. Petroleum & Natural Gas Well Development	795,900	41
7. Petroleum & Natural Gas Well Maintenance	697,300	31
8. Petroleum & Natural Gas Extraction	2,576,000	179
9. Other Mining	465,300	33
10. Construction	48,950,000	2,472
11. Prepared Feeds	10,160,000	297
12. Other Food Products	15,620,000	1,402
13. Apparel, Purchased Material	10,070,000	993
14. Other Apparel	47,170	6
15. Wood Products	219,600	24
16. Furniture	34,450	3
17. Paper Products	100,600	7
18. Printing and Publishing	3,004,000	258
19. Chemicals	481,300	34
20. Rubber and Plastic Products	406,000	44
21. Leather Products	56,210	6
22. Stone, Clay and Glass	2,097,000	151
23. Fabricated Metals	845,100	63
24. Machinery, Except Electrical	593,300	56
25. Electrical Equipment	1,699,000	124
26. Motor Vehicles	9,572,000	635
27. Other Transportation Equipment	44,880	3
28. Miscellaneous Manufacturing	747,800	82
29. Railroads	9,329,000	815
30. Other Transportation	10,910,000	875
31. Communication	7,867,000	539
32. Utilities	6,367,000	517
33. Wholesale Trade	20,720,000	1,816
34. Retail Trade	40,590,000	6,274
35. Finance, Insurance-Real Estate	24,690,000	2,036
36. Hotels and Lodging Places	4,957,000	1,029
37. Personal Services	5,732,000	625
38. Business Services	4,672,000	524
39. Professional Services	7,272,000	488
40. Eating and Drinking Places	11,070,000	2,974
41. Auto Repair and Service	5,550,000	327
42. Amusement and Recreation Services	5,816,000	621
43. Other Services	24,000,000	2,403
44. BLM Range Improvements	405,500	29
	<hr/> \$319,715,510	<hr/> 33,034

<sup>a/</sup> Does not include proprietor income.

Source: BLM Roswell District Input/Output (I/O) files



## "I" CATEGORY ALLOTMENTS/EAST CHAVES MFP

Allot. Number	Operator Name	Federal Acres	Condition	Apparent Trend a/
5014	McDowell, Abner	1,890	Fair	-
5018	Bilberry Bud	3,858	Fair	+
5020	Cooper, Tom	4,613	Fair	+
5024	Durham, Bill	3,584	Fair	-
5025	Marley, Robert	4,798	Fair	-
5032	Davis, Tom	8,479	Fair	-
5036	Cooper, Carl	3,111	Fair	+
5038	Graham, Lyman	1,590	Fair	-
5043	Sand Ranch	8,395	Fair	+
5044	Isler Ranch	1,361	Fair	-
5046	Caprock	9,823	Fair	-
5049	Clemmons & Erdmann	5,428	Fair	+
5051	Marley, Robert	17,752	Fair	-
5053	Pearce, Roy	17,682	Fair	+
5063	Culp, Julia et al	2,944	Fair	+
5065	Graham, Annie M.	6,124	Fair	-
5066	Spears, J. D. & Raymond	2,520	Poor	S
5068	Malmstrom, Orville	13,723	Fair	-
5073	Derrick, Millard	2,956	Fair	-
5074	Barbe, Madeline	7,293	Fair	+
5075	Bogle, Bill	230,502		
	River	(56,950)	Good	S
	Millman		Fair	+
	Vest Camp		Fair	-
	Double Well		Fair	+
	Pipeline		Fair	-
5079	S & S	2,557	Fair	-
5082	Gomez, Gilbert	789	Fair	-
5083	Wilson, Charles	3,443	Poor	-
5084	Greenwood, George	8,149	Good	-
5085	Taylor & Medlin	5,704	Fair	S
5090	Sams & Dean	3,137	Fair	+
5091	Bell, Joe	6,290	Fair	-
	TOTAL	388,495	Good	S

a/ Apparent Trend: + Upward; - Downward; S Static



U.S. DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT

Roswell District Office  
Roswell Resource Area

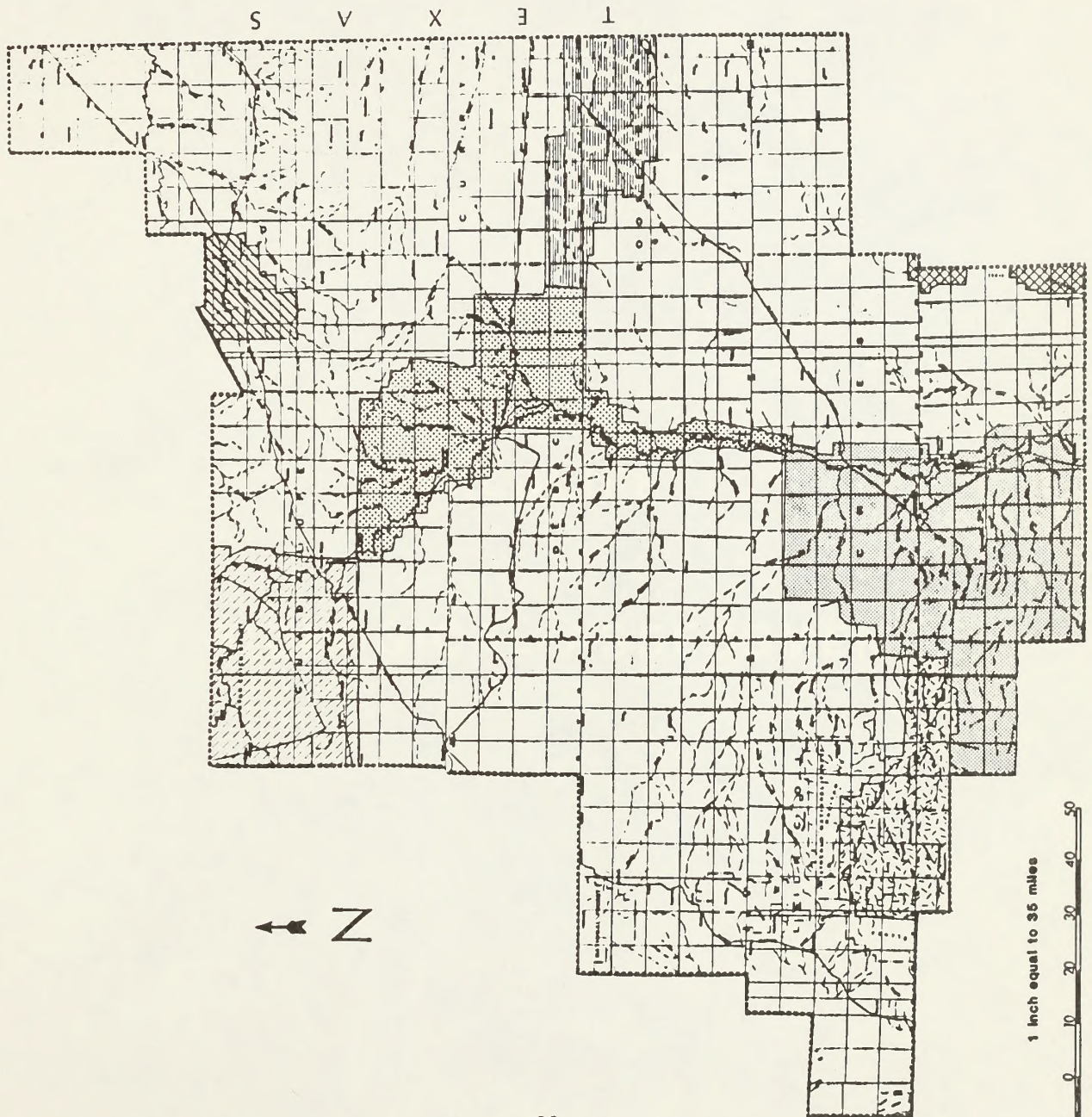
1984

ROS WELL

MANAGEMENT FRAMEWORK PLAN  
AMENDMENT

ENVIRONMENTAL IMPACT STATEMENT

Map D-d DECLARED  
UNDERGROUND WATER  
BASINS



	2 ROSWELL
	3 LEA COUNTY
	9 PORTALES
	10 HONDO
	20 FORT SUMNER
	24 UPPER PECOS
	31 TUCUMCARI







**APPENDIX E**

**WILDLIFE**

**BIOLOGICAL ASSESSMENT**









UNITED STATES  
DEPARTMENT OF THE INTERIOR  
FISH AND WILDLIFE SERVICE

Field Supervisor  
Ecological Services, USFWS  
Post Office Box 4487  
Albuquerque, New Mexico 87196

Cons. #2-22-83-I-092

June 28, 1984

Memorandum

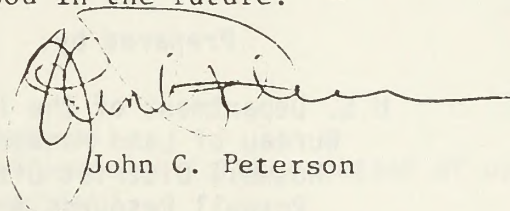
To: District Manager, Bureau of Land Management,  
Roswell Resource Area, Roswell, New Mexico

From: Field Supervisor, FWS, Ecological Services,  
Albuquerque, New Mexico

Subject: Biological Assessment for the Roswell Resource  
Area, Management Framework Plan Amendment/Draft  
Environmental Impact Statement

We have reviewed your letter of May 25, 1984 which included changes to your assessment. Your action involves rangeland management in Chaves, Lincoln, Quay, Curry, DeBaca, Guadalupe and Roosevelt Counties, New Mexico.

We agree with your determination of no affect for the bluntnose shiner. Further Section 7 consultation is not necessary unless new information becomes available concerning listed species, new species are listed that may be affected by your action or the proposed action is modified. We look forward to working with you in the future.

  
John C. Peterson

cc:

Regional Director, FWS, HR and SE, Albuquerque, New Mexico

RECEIVED  
JUN 29 9 33 AM '84



Biological Assessment  
for  
Roswell Resource Area  
Management Framework Plan Amendment/  
Environmental Impact Statement

Prepared by:

U.S. Department of the Interior  
Bureau of Land Management  
Roswell District Office  
Roswell Resource Area

March 1984



## Background Information

The implementation of a rangeland management program has been determined to be a major Federal action for which both an Environmental Impact Statement (EIS) and Biological Assessment (BA) are required in compliance with the National Environmental Policy Act (NEPA) and the 1973 Endangered Species Act. This BA is intended to meet the requirements set forth in the Endangered Species Act, and amendments thereof, for Bureau of Land Management (BLM) authorized activities proposed in the Roswell Management Framework Plan Amendment/Environmental Impact Statement (MFPA/EIS). Potential effects to Federal listed threatened, endangered, and candidate (category 1 and 2 plants, category 1 animals) species are addressed.

## Introduction

The Bureau of Land Management, Roswell District Office, proposes to implement a rangeland management program for the Roswell Resource Area located in Chaves, Lincoln, Quay, Curry, DeBaca, Guadalupe, and Roosevelt counties of southeastern New Mexico. The Rangeland Management issue involves the amount of vegetation available for grazing and other uses; the methods of monitoring and evaluation, and rangeland improvements. Six alternatives, including a proposed action and the District's preferred alternative, have been analyzed: Proposed Action, District Preferred Alternative, Industry Preferred Alternative, Elimination of Livestock Grazing, Maximization Forage for Livestock, and Decreased Livestock Grazing.

In conjunction with the development of the MFPA/EIS, the 284 grazing permits and leases authorized in the Roswell Resource Area were placed into management categories: M - Maintain, I - Improve, and C - Custodial. The categorization is designed to facilitate assigning management priorities among allotments. Management actions which could occur by category include the following:

### Maintain Category

Proposed grazing operations:

- Normal grazing operation (proper season of use, number and kind of livestock).
- Increases in livestock grazing use.

Monitoring at intensity needed to detect undesirable changes.

Allowable range improvements.

CMP development.

Standard operating procedures.

### Improve Category

Proposals for resolving identified issues and conflicts, including: Initial stocking levels (season of use, number and kind of livestock).

Constraints on livestock grazing use needed to protect or enhance other resource uses and values.

Production inventories and vegetation or forage allocations needed to resolve conflicts.



Monitoring at intensity needed to help resolve issues and conflicts.  
Site-specific range improvements (if known), or typical improvements  
needed to meet multiple-use objectives.  
CMP development proposed.  
Standard operating procedures.

#### Custodial Category

Proposed grazing operations:

- Normal operation (season of use, number and kind of livestock).
- Licensing on an ephemeral forage basis.
- Livestock use excluded.

Monitoring at intensity needed to protect existing resource values.  
Allowable rangeland improvements.  
CMP development proposed.  
Standard operating procedures.

Allotment categories will be periodically evaluated, during a five year monitoring program, to determine if the allotment characteristics have changed significantly enough to warrant a change in categories.

#### Description of the Proposed Action and Alternatives

##### Proposed Action (PA)

The PA is the continuation of current management practices (no action). Initial and long-term livestock stocking rates would be set at the 5-year-average-licensed-use level of 228,656 AUMs. BLM range improvement funds would be used in areas where existing plans have been approved (Ft. Stanton MFP and East Chaves MFP). No new grazing management plans would be developed.

##### District Preferred Alternative (DPA)

The DPA is designed to correct identified problems using a more intensive management program than is currently prescribed. Short-term stocking rates would be set at 219,695 AUMs with adjustments being taken on "I" category allotments. Long-term stocking rates are projected at 246,028 AUMs with increases being taken in both "M" and "I" category allotments. Range improvements, vegetation treatments, and grazing programs would be implemented on "I" category allotments, including: 15.5 miles of 4-strand barbed-wire fence, 17.5 miles of net-wire fence, 38 new water developments, 32.5 miles of water pipeline, 47,022 acres of brush control (30,177 acres of chemical control), and grazing programs on 290,493 acres.

##### Industry Preferred Alternative (IPA)

This alternative was developed and offered by the New Mexico Department of Agriculture and the Southeastern New Mexico Grazing Association. Emphasis is placed on range improvements and vegetation treatments to correct problems, with minimal BLM management. Short-term stocking rates would be 219,695 AUMs; long-term stocking rates are projected at 236,937 AUMs. Rangeland improvements and vegetation treatments, implemented on "I" category allotments, are identical to those prescribed in the DPA.



### Elimination of Livestock Grazing (ELG)

Under the ELG alternative, all domestic livestock grazing on public land would be discontinued and all vegetation would be available to enhance wildlife habitat, watershed stabilization, and aesthetics. Rangeland improvement projects would be limited to those improvements which would benefit wildlife, watershed, or other resources as special appropriations are made. Existing improvements which would interfere with wildlife movements, or which would serve no useful purpose, would be removed.

### Maximization of Forage for Livestock (MAX)

The management direction under the MAX alternative is to initiate an intensive program of rangeland management designed to achieve maximum forage production for livestock. Short-term stocking rates would be set at 213,556 AUMs; long-term stocking rates are projected to be 296,061 AUMs with increases in both "M" and "I" category allotments. Rangeland improvements, vegetation treatments, and grazing programs would be initiated on both "M" and "I" category allotments, including: 17.5 miles of 4-strand barbed-wire fence, 29.5 miles of net-wire fence, 80 new water developments, 69.1 miles of water pipeline, 51,200 acres of vegetation treatments (31,737 acres of chemical brush control), and grazing programs on 899,745 acres.

### Decreased Livestock Grazing (DLG)

Under the DLG, licensed grazing would be reduced by approximately 23 percent overall. Reductions would occur on both "M" and "I" category allotments, depending on the amount of poor and fair condition range, if any, per allotment. Livestock grazing would be eliminated on 23,502 acres of poor condition rangeland, and reduced 50 percent on 340,800 acres of fair condition range. Long-term stocking rates are projected at 175,686 AUMs. Range improvements would be initiated only in areas with existing approved plans (Ft. Stanton MFP, East Chaves MFP).

## Environmental Consequences of the Proposed Action and Alternatives

### Proposed Action (PA)

Under the PA, wildlife numbers would fluctuate slightly with climate and habitat conditions, but would generally remain the same. Range and watershed conditions would remain about the same and continue current trends. No changes would occur to other resource components.

### District Preferred Alternative (DPA)

Under the DPA, wildlife numbers would increase or remain unchanged: Mule deer +17%; Antelope +27%; Upland game and waterfowl - unchanged. Range conditions would improve; acreage in the good condition class would increase by 34 percent. Watershed conditions would improve with the acreage in the critical erosion class decreasing by 35 percent. Recreation visitor hours would increase by 18 percent (10,151 hours). Socioeconomic conditions would reflect a 3.9 percent increase in ranch operators' overall gross income.



### Industry Preferred Alternative (IPA)

Under the IPA, wildlife numbers would increase or remain unchanged: Mule deer +11%; Antelope +9%; Upland game and waterfowl - unchanged. Range conditions would improve, with acreage in the good condition class increasing by 8 percent. Watershed conditions would improve, with the acreage in the critical erosion class decreasing by 20 percent. Recreation visitor hours would increase by 13 percent (7,403 hours). Socioeconomic conditions would reflect a 3.5 percent increase in ranch operators' overall gross income.

### Elimination of Livestock Grazing (ELG)

Under the ELG, wildlife numbers would increase: Mule deer +33%; Antelope +49%; Upland game and waterfowl - slight increase. Range conditions would improve, with acreage in the good condition class increasing by 53 percent. Watershed conditions would improve, with the acreage in the critical erosion class decreasing by 20 percent. Recreation visitor hours would increase by 35 percent (19,040 hours). Socioeconomic conditions would reflect a 47.8 percent decrease in ranch operators' overall gross income.

### Maximization of Forage for Livestock (MAX)

Under the MAX, wildlife numbers would decrease: Mule deer -5%; Antelope -25%; Upland game and waterfowl - slight decrease. Range conditions would change, with a 20 percent decrease in the good condition class acreage. Watershed conditions would improve, with the acreage in the critical erosion class decreasing by 35 percent. <sup>a/</sup> Recreation visitor hours would decrease by 7 percent (3,633 hours). Socioeconomic conditions would reflect a 17.7 percent increase in ranch operators' overall gross income.

### Decreased Livestock Grazing (DLG)

Under the DLG, wildlife numbers would increase or remain unchanged: Mule deer +21%; Antelope +16%; Upland game and waterfowl - unchanged. Range conditions would improve, with the acreage in the good condition class increasing by 52 percent. Watershed conditions would improve, with the acreage in the critical erosion class decreasing by 20 percent. Recreation visitor hours would increase by 17 percent (9,462 hours). Socioeconomic conditions would reflect a 19.5 percent decrease in ranch operators' overall gross income.

### Standard Operating Procedures and Mitigation Measures

Standard operating procedures have been established to avoid creating any threat to Federal or State T/E species. Site by site analysis, consultation, and mitigation would occur in any area where a potential threat may exist.

a/ Vegetation treatments would be accomplished on the areas that are included in the critical erosion class and management would be applied to these areas.



1. A threatened, endangered, State-listed, or proposed-listed species clearance would be conducted by an appropriate BLM staff biologist prior to the beginning of any project. If a "may affect" determination is made by the staff biologist, consultation would be undertaken with U.S. Fish and Wildlife Service (USFWS), New Mexico Department of Game and Fish (NMDG&F), or the New Mexico Natural Heritage Program (NMNHP) listing the species which may be affected. The results of the consultation would determine the course of action necessary to avoid adverse effects on listed species.

2. Application of herbicides would be in conformance with BLM Manual 9220 and State of New Mexico and U.S. Environmental Protection Agency (USEPA) standards. Herbicides proposed for use would be authorized by the USEPA, the New Mexico Department of Agriculture (NMDA), and the DOI, and must be registered by the USEPA and NMDA. NMDA restricted use regulations would be consulted prior to any herbicide application.

3. Areas meeting riparian and wetland habitat criteria would be assessed to determine if protection is needed to provide wildlife habitat. Protection measures would be selected for individual situations to include protective fencing, adjustments in livestock use, and/or establishment of buffer strips, as necessary.

#### Federal Listed Animal Species

Bluntnose Shiner - Notropis simus - Federal proposed

The subspecies, N. s. pecosensis, occurs in the Pecos River from south of Santa Rosa to the Major Johnson Springs and north of Carlsbad (Hatch 1983). No population estimates have been conducted, however, the present abundance of N. s. pecosensis appears to be much lower than in the past based on collection records. Critical habitat has not been designated for this species.

Research indicates altered flows, water quality, increased sedimentation, and the use of fish toxicants are probably contributing factors that may have eliminated N. s. pecosensis in some spring systems (Hatch 1983, Hubbard 1979). The DPA, IPA, and MAX alternatives prescribe a program of rangeland improvements and vegetation treatments, including chemical brush control, to improve rangeland condition. Sufficient precautions would be used during application of herbicides to prevent contamination of any live waters. Included among the standard operating procedures listed on pages 1-18 through 1-20 are two which would provide protection for N. s. pecosensis habitat (Pecos River):

12. Application of herbicides would be in conformance with BLM Manual 9220 and State of New Mexico and U.S. Environmental Protection Agency (USEPA) standards. Herbicides proposed for use would be authorized by the USEPA, the New Mexico Department of Agriculture (NMDA), and the DOI, and must be registered by the USEPA and NMDA. NMDA restricted use regulations would be consulted prior to any herbicide application.

14. Important wildlife habitat, such as broadleaf tree groves, aquatic and riparian sites, dirt tanks, watering tubs, active raptor nests, and the areas around them would be protected during brush control operations. These



areas would be protected through the use of nonlethal rates of herbicides, or other means as deemed appropriate by resource specialists. Pseudoriparian areas and most major drainages, would be excluded from chemical treatment. Drainages containing perennial streams would be excluded from chemical treatment programs within a distance of 1,320 feet.

Under the Proposed Alternative, sediment yields would remain at the existing slight levels of approximately 0.40 ac.ft./mi.<sup>2</sup>/yr. All other alternatives decrease sediment yields to between 0.30 and 0.35 ac.ft./mi.<sup>2</sup>/yr. as a result of improved ecological range condition class. These levels are still within the slight sediment yield class. Sedimentation occurring at the existing slight level on public lands addressed in our MFPA/EIS is not believed to be a factor significantly limiting the species. The lack of instream flow resulting from impoundment, diversion, and irrigation use of the Pecos River; pumping of surrounding subsurface aquifers; and feed lot runoff, for which BLM has no control, are the primary factors limiting the bluntnose shiner. In view of this, we conclude that there will be no effect on the bluntnose shiner resulting from actions proposed in the West Roswell MFPA/EIS.

#### Federal Listed Plant Species

Kuenzler Hedgehog Cactus - Echinocereus fendleri var. kuenzleri - Endangered

This species occurs on gently sloping limestone outcrops in the Pinyon/Juniper association near Elk and possibly near Tinnie, at approximately 6,000 feet (Wagner and Sabo, 1978). These isolated populations were found on Forest Service lands and privately owned lands. A thorough search of potential habitat on BLM lands was conducted by biologists in 1982-1983. No populations or individual plants of E. kuenzleri were found on BLM surface. No critical habitat has been designated.

It appears the most critical threat to E. kuenzleri is from unauthorized private collectors. None of the alternatives analyzed in the MFPA/EIS would affect E. kuenzleri. The potential habitat does not occur near any areas which would be a candidate for vegetation treatments or rangeland improvements.

Desert Rose (Star Rose) - Rosa stellata - Candidate

Indistinct characteristics and confusion among taxonomists have created unresolved problems in classifying the various subspecies of R. stellata which occur in southeastern New Mexico. At least one subspecies, probably R. stellata var. mirifica, occurs somewhat commonly in the White and Sacramento Mountains in Lincoln County (pers. comm. Reggie Fletcher, USFS, Albuquerque). The species occurs on open rocky slopes at elevations of 5,000 to 8,000 feet (Martin and Hutchins 1980).

Specimens have been collected from Forest Service lands and Mescalero Indian Reservation lands in the White and Sacramento Mountains (NMHP files). It is unlikely that the species occurs on BLM lands within the resource area. None of the actions proposed in this MFPA/EIS would adversely impact the species. No range improvements or vegetation treatments are proposed in areas where R. stellata could potentially occur. Livestock grazing would not be a threat to this species.



Panhandle Euphorbia (Panhandle Spurge) - Euphorbia strictior

E. strictior occurs on dry hills and plains in eastern New Mexico at elevations of 4,000 to 6,000 feet (Martin and Hutchins, 1980). In the Roswell Resource Area, it occurs in Quay County which contains only 1,000 acres of BLM surface, or much less than 1 percent of the county's land area.

No vegetation treatments or rangeland improvements are proposed for Quay County in this MFPA/DEIS. No BLM authorized activities would affect the continued survival of E. strictior.

[In the November 28, 1983 Federal Register (Vol. 229, pgs. 53640-53670), E. strictior was designated as Category 3C, having been reviewed and the determination made not to classify this species on the Federal list.]

State Listed Species

Of the species identified by the State, five species - two animals and three plants - received a "may-affect" determination following analysis of the proposed actions described in the alternatives.

State Listed Animal Species

Trans-Pecos Rat Snake - Elaphe subocularis - Group II

The trans-pecos rat snake is an inhabitant of arid to semi-arid, rocky, desert shrub areas (Hubbard 1979). Preferred habitat includes creosote brush habitats (Stebbins 1954). Control of creosote proposed in the DPA, IPA, and MAX alternatives would be detrimental to this species unless islands of creosote brush were left scattered throughout the control area. Site by site analysis would occur and consultation with NMDGF would be carried out.

Sanddune Sagebrush Lizard - Sceloporus graciosus arenicolus - Group II

Control of shinners oak proposed in the DPA alternative in the East Roswell area, without specific mitigating measures, would be detrimental to the sanddune sagebrush lizard. Naturally occurring dune stabilization and low population densities (3.0 to 4.8/ac) prompted the listing of this species as State Endangered Group II, and the proposal for Federal listing. Degenhardt and Sena (1976) and Egbert (1979) described 4 habitat types within the shinners community - sand flats, oak sand hummocks, dune interface, and open dunes - and indicated that stabilization of dune/blowout shinners habitat would critically lower sanddune sagebrush lizard densities. Shinners control would greatly speed up the dune stabilization process. Both oak/sand hummocks, and dune interface habitats are considered preferred habitat, and are usually found within the readily identifiable SCS SD-3 sandhills range site. To mitigate potential adverse impacts on the sanddune sagebrush lizard population, essential lizard habitat would be maintained in the SD-3 sandhills range site in each spray pasture.

State Listed Plant Species

Guadalupe Milkvetch - Astragalus pictiformis - Special Concern

Guadalupe milkvetch is found on stony limestone hills and plains. It is an uncommon cool season perennial. Brush control proposed in the DPA, IPA,



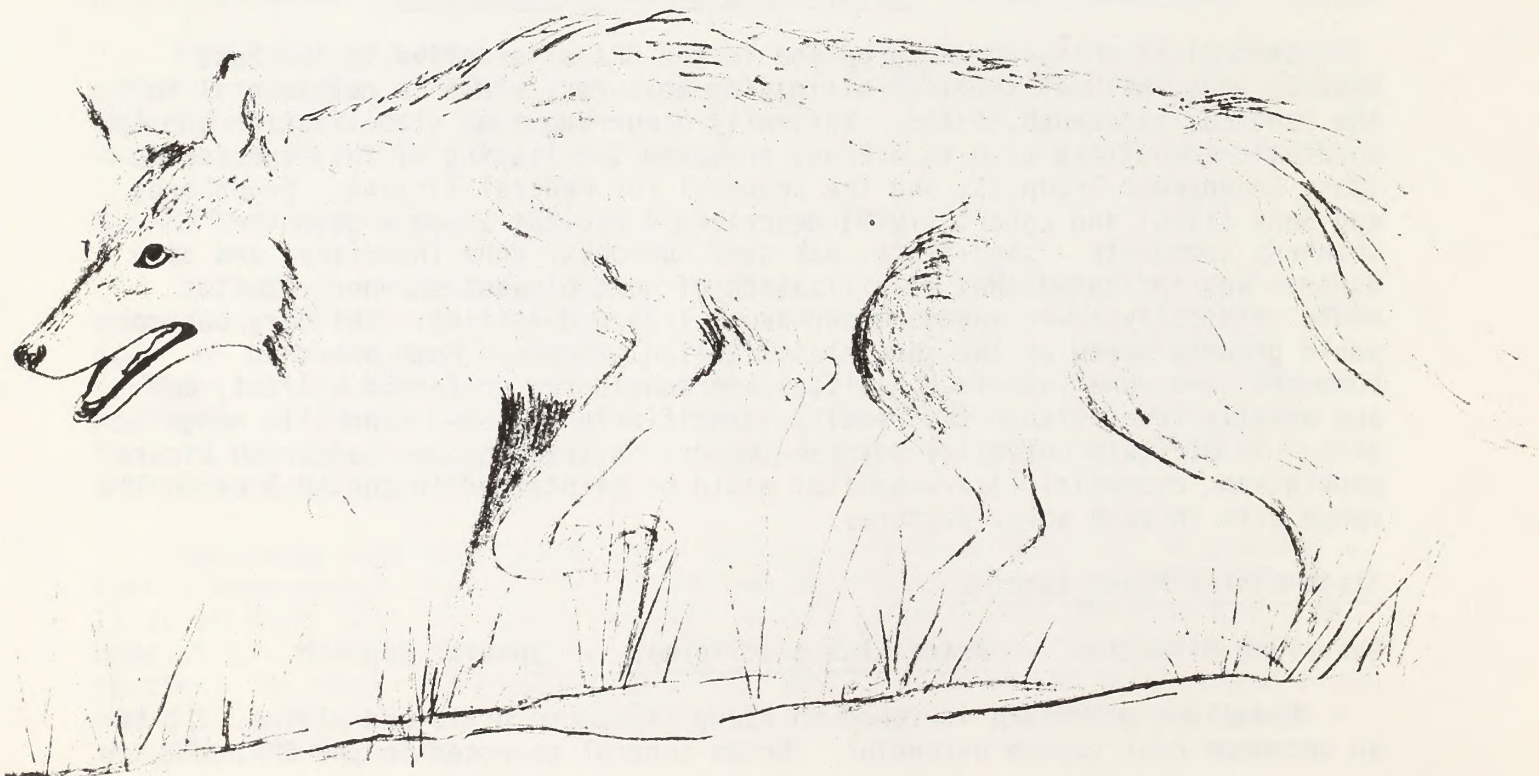
and MAX alternatives could adversely affect this species by directly killing plants. Field checks, prior to brush control, would be required to ensure this species is not found within proposed spray areas. Mitigation would be limited to preserving those habitats where it is found. The Guadalupe milkvetch may be affected by livestock grazing, however, the extent of the impact is unknown.

Zephyr Lily - Zephyranthes longifolia - Special Concern

Zephyr lilies are inhabitants of alkaline soils on plains habitats in the area of concern. Brush control proposed under the DPA, IPA, and MAX alternatives would adversely affect this species. Field checks prior to brush treatment would be required to ensure survival of this species. Mitigation would consist of preserving habitat.

Davis Cholla - Opuntia davisii - Special Concern

Davis cholla is a relatively common inhabitant of limestone canyon and plains habitats that may or may not be infested with mesquite. Chemical or mechanical control proposed in the DPA, IPA, and MAX alternatives in these areas would adversely affect the Davis cholla. Field checks prior to treatment of mesquite would be required to ensure protection of this species. Mitigation would consist of preserving occupied habitat.





## Literature Cited

- Degenhardt, W.G. and A.P. Sena. "Report on the Endangered Sand Dune (Sagebrush) Lizard, Sceloporus graciosus arenicolus, in Southeastern New Mexico." Museum of Southwest Biology, University of New Mexico, Albuquerque, New Mexico. 1976.
- Egbert, J.C. "Endangered and Threatened Vertebrate Species Survey and Report: Mathers Instant Study Area, Chaves County, New Mexico." Report BLM Contract YA-512-CT9-46, 1979.
- Hatch, M.D. "The Status of Notropis simus pecosensis in the Pecos River of New Mexico with Notes on Life History and Ecology." NMDG&F Report. 1983.
- Hubbard, J.P. Handbook of Species Endangered in New Mexico. NMDG&F, 1979.
- Martin, W.C. and C.R. Hutchins. A Flora of New Mexico. A.R. Gantner Verlag K.G., Vadiz Germany. 2592 pp. 1980.
- Stebbins, R.C. Amphibians and Reptiles of Western North America. New York, N.Y.: McGraw Hill Book Company. 1954.
- Wagner, W.L. and D.G. Sabo. "Status Report for Echinocereus fendleri var. kuenzleri." USFWS. 1978.



Common Name	Scientific Name	Status	Determination of Affect
<u>FEDERAL SPECIES</u> (Identified by USFWS)			
Animal			
Bluntnosed shiner	<u>Notropis simus</u>	Proposed	no affect
Plant			
Kuenzler hedgehog cactus	<u>Echinocereus fendleri</u>	Endangered	no affect
	var. <u>kuenzleri</u>		no affect
Desert rose	<u>Rosa stellata</u>	Candidate	no affect
Panhandle euphorbia	<u>Euphorbia strictior</u>	Candidate	no affect
<u>FEDERAL SPECIES</u> (Identified by NMDG&F, NMHP)			
Animal			
Black footed ferret a/	<u>Mustela nigripes</u>	Group I b/	no affect
Peregrine falcon a/	<u>Falco peregrinus anatum</u>	Group I	no affect
Bald eagle a/	<u>Haliaeetus leucocephalus</u>	Group II	no affect
Pecos gambusia a/	<u>Gambusia nobilis</u>	Group II	no affect
<u>STATE SPECIES</u>			
Animal			
Tularosa Black-tailed			
Prairie dog	<u>Cynomys ludovicianus</u>	Group II c/	no affect
Mississippi kite	<u>Ictinia mississippiensis</u>	Group II	no affect
Least tern	<u>Sterna antillarum</u>	Group II	no affect
Gray vireo	<u>Vireo vicinior</u>	Group II	no affect
Baird's sparrow	<u>Ammodramus bairdii</u>	Group II	no affect
McCown's longspur	<u>Calcarius mccowni</u>	Group II	no affect
River cooter	<u>Pseudemys concinna</u>	Group II	no affect
Sanddune sagebrush lizard	<u>Sceloporus graciosus</u>		
	<u>arenicolus</u>	Group II	may affect
Plainbelly water snake	<u>Nerodia erythrogaster</u>	Group II	no affect
Trans-pecos rat snake	<u>Elaphe subocularis</u>	Group II	may affect
(Pecos) western ribbon snake	<u>Thamnophis proximus</u>		
	<u>diabolicus</u>	Group II	no affect
Sacramento mountain			
salamander	<u>Plethodon neomexicana</u>	Group II	no affect
Eastern barking frog	<u>Hylaephyne augusti</u> <u>latrans</u>	Group II	no affect
Gray redbone	<u>Moxostoma congestum</u>	Group I	no affect
Arkansas river shiner	<u>Notropis girardi</u>	Group I	no affect
Mexican tetra	<u>Astyanax mexicanus</u>	Group II	no affect
Bluntnosed shiner	<u>Notropis simus pecosensis</u>	Group II	no affect
Suckermouth minnow	<u>Phenacobius mirabilis</u>	Group II	no affect
Mississippi silvery minnow	<u>Hybognathus nuchalis</u>	Group II	no affect
Speckled chub	<u>Hybopsis aestivatis</u>		
	<u>tetranemus</u>	Group II	no affect



Common Name	Scientific Name	Status	Determination of Affect
Bigscale logperch	<u>Percina macrolepida</u>	Group II	no affect
Greenthroat darter	<u>Etheostoma lepidum</u>	Group II	no affect
Pecos assiminea	<u>Assiminea spp.</u>	Group I	no affect
Roswell spring snail	<u>Fonticella spp.</u>	Group I	no affect
Pope's mussel	<u>Popenatas popei</u>	Group I	no affect
Pecos spring snail	<u>Fonticella spp.</u>	Group II	no affect
Koster's spring snail	<u>Tryonia spp.</u>	Group II	no affect
Say's pond snail	<u>Lymnaea caperata</u>	Group II	no affect
New Mexico ramshorn snail	<u>Planorbidae spp.</u>	Group II	no affect
Plant			
Bigtooth maple	<u>Acer grandidentatum</u>	Special Concern	d/ no affect
Gyp ringstem	<u>Anulocaulis gypsogenus</u>	Special Concern	no affect
Rock spleenwort	<u>Asplenium resiliens</u>	Special Concern	no affect
New Mexico Astragalus	<u>Astragalus neomexicanus</u>	Special Concern	no affect
Guadalupe milkvetch	<u>Astragalus pictiformis</u>	Special Concern	may affect
Brickellbush	<u>Brickellia modesta</u>	Special Concern	no affect
Indian paintbrush	<u>Castilleja woottoni</u>	Special Concern	no affect
	<u>Cirsium inornatum</u>	Special Concern	no affect
	<u>Circaea alpina</u>	Special Concern	no affect
Striped coralroot	<u>Coralorrhiza striata</u> var <u>striata</u>	Special Concern	no affect
Kuenzler Hedgehog cactus	<u>Echinocereus fenderi</u> var <u>kuenzleri</u>	Special Concern	no affect
Common button cactus	<u>Epithelantha micromeris</u>	Special Concern	no affect
Panhandle euphorbia	<u>Euphorbia strictior</u>	Special Concern	no affect
Snowy prairie-gentian	<u>Eustoma grandiflorum</u>	Special Concern	no affect
Bog orchid	<u>Habenaria sparsiflora</u> var <u>brevifolia</u>	Special Concern	no affect
	<u>Hedeoma costatum</u>	Special Concern	no affect
False pennyroyal	<u>Hedeoma pulcherrima</u>	Special Concern	no affect
Gyp sunflower	<u>Helianthus paradoxus</u>	Special Concern	no affect
Dedberry juniper	<u>Juniperus pinchotii</u>	Special Concern	no affect
	<u>Justicia wrightii</u>	Special Concern	no affect
Golden bladderpod	<u>Lesquerella aurea</u>	Special Concern	no affect
Scaly bladderpod	<u>Lesquerella valida</u>	Special Concern	no affect
California sealavender	<u>Limonium limbatum</u>	Special Concern	no affect
Lupine	<u>Lupinus albus</u>	Special Concern	no affect
White Mountain Lupine	<u>Lupinus stieriae-blancæ</u>	Special Concern	no affect
Stickleaf	<u>Mentzelia perennis</u>	Special Concern	no affect
Nama	<u>Nama foitosum</u>	Special Concern	no affect
Davis cholla	<u>Opuntia davisii</u>	Special Concern	may affect
Royal beardstongue	<u>Penstemon cardinalis</u> var <u>cardinalis</u>	Special Concern	no affect
Scorpionweed	<u>Phacelia depauperata</u>	Special Concern	no affect
Scorpionweed	<u>Phacelia intermedia</u>	Special Concern	no affect
Scorpionweed	<u>Phacelia rupestris</u>	Special Concern	no affect
Silvercup mockorange	<u>Philadelphus argyrocalyx</u>	Special Concern	no affect



Common Name	Scientific Name	Status	Determination of Affect
Thurber pilostyles	<u>Pilostyles thurberi</u>	Special Concern	no affect
Primrose	<u>Primula ellisiae</u>	Special Concern	no affect
Desert rose	<u>Rosa stellata</u>	Special Concern	no affect
Figwort	<u>Scrophularia montana</u>	Special Concern	no affect
Ladiestresses	<u>Spiranthes parasitica</u>	Special Concern	no affect
	<u>Tetradymia filiofolia</u>	Special Concern	no affect
Wright spiderwort	<u>Tradescantia wrightii</u>	Special Concern	no affect
Texas valerian	<u>Valeriana texana</u>	Special Concern	no affect
Zephyr Lily	<u>Zephyranthes longifolia</u>	Special Concern	may affect

- a/ These species are also on the Federal endangered species list but were not selected by USFWS for analysis in this document.
- b/ Group I - Indicates endangered status
- c/ Group II - Indicates threatened status
- d/ Plants of special concern have no legislative acknowledgements, therefore no legal protection











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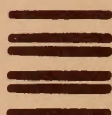
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